

Jayla Allen, et al. vs. Waller County Texas, et al.
 Jayla Jenice Allen - 10/11/2019

Page 1	Page 3
<p>1 IN THE UNITED STATES DISTRICT COURT 2 FOR THE SOUTHERN DISTRICT OF TEXAS 3 HOUSTON DIVISION</p> <p>3 JAYLA ALLEN, DAMON) 4 JOHNSON, TREASURE SMITH,) 5 AND THE PANTHER PARTY,) 6 Plaintiffs,)</p> <p>5 VS.) CIVIL ACTION NO.: 6 4:18-CV-3985)</p> <p>7 WALLER COUNTY TEXAS; THE) 8 WALLER COUNTY) 9 COMMISSIONERS COURT;) 10 JUDGE CARBETT "TREY" J.) 11 DUHON III, IN HIS) 12 OFFICIAL CAPACITY AS THE) 13 WALLER COUNTY JUDGE; AND) 14 CHRISTY A. EASON, IN HER) 15 OFFICIAL CAPACITY AS THE) 16 WALLER COUNTY ELECTIONS) 17 ADMINISTRATOR,) 18 Defendants.)</p> <p>19 ***** 20 ORAL DEPOSITION OF 21 JAYLA JENICE ALLEN 22 OCTOBER 11, 2019 23 *****</p> <p>24 ORAL DEPOSITION OF JAYLA JENICE ALLEN, produced 25 as a witness at the instance of the Defendants and duly 26 sworn, was taken in the above-styled and numbered cause 27 on OCTOBER 11, 2019, from 9:57 a.m. to 3:01 p.m., before 28 SHERRI SANTMAN FISHER, Certified Shorthand Reporter in 29 and for the State of Texas, reported by machine 30 shorthand, at the University Square Clubhouse, 502 Anne 31 Preston Street, Prairie View, Texas, pursuant to the 32 Federal Rules of Civil Procedure and the provisions 33 stated on the record or attached hereto.</p>	<p>1 INDEX</p> <p>2 PAGE</p> <p>3 Appearances 2</p> <p>4 Stipulations 5</p> <p>5 Examination by Mr. Seaquist 5 6 9:57 a.m. - 11:25 a.m. 7 11:34 a.m. - 1:08 p.m. 8 1:15 p.m. - 1:41 p.m. 9 2:02 p.m. - 2:02 p.m.</p> <p>10 Examination by Ms. Aden 168 11 2:02 p.m. - 2:50 p.m.</p> <p>12 Examination by Mr. Seaquist 205 13 2:53 p.m. - 2:56 p.m.</p> <p>14 Examination by Ms. Aden 208 15 2:56 p.m. - 3:01 p.m.</p> <p>16 Changes and Corrections 214</p> <p>17 Signature 215</p> <p>18 Reporter's Certification 216</p> <p>19 EXHIBIT INDEX</p> <p>20 NO. DESCRIPTION PAGE</p> <p>21 1 Plaintiff Jayla Allen's Responses and 16 22 Objections to Defendant Waller County's 23 First Set of Interrogatories</p> <p>24 2 Prairie View A&M University Map 17</p> <p>25 3 Facebook Post Dated December 13, 2017 34</p> <p>26 4 Course Schedule 66</p> <p>27 5 Twitter Post Dated October 25, 2018 122</p> <p>28 6 Google Map 136</p> <p>29 7 2018 General Election Early Voting 143 30 Locations</p>
Page 2	Page 4
<p>1 APPEARANCES</p> <p>2 FOR THE PLAINTIFFS:</p> <p>3 MS. LEAH ADEN 4 MR. JOHN CUSICK 5 NAACP LEGAL DEFENSE AND EDUCATIONAL FUND, INC. 6 40 Rector Street 7 Fifth Floor 8 New York, New York 10006-1738 9 212-965-7715/212-226-7592 (fax) 10 laden@naacpldf.org 11 jcusick@naacpldf.org 12 MS. JULIE GOODRICH HARRISON 13 NORTON ROSE FULBRIGHT US LLP 14 1301 McKinney 15 Suite 5100 16 Houston, Texas 77010-3095 17 713-651-5151/713-651-5246 (fax) 18 julie.harrison@nortonrosefulbright.com 19 (Not Present)</p> <p>20 FOR THE DEFENDANTS:</p> <p>21 MR. GUNNAR P. SEAQUIST 22 BICKERSTAFF HEATH DELGADO ACOSTA LLP 23 3711 South Mopac Expressway 24 Building 1, Suite 300 25 Austin, Texas 78746 26 512-472-8021/512-320-5638 (fax) 27 gseaquist@bickerstaff.com 28 MS. ELIZABETH DORSEY 29 WALLER COUNTY DISTRICT ATTORNEY'S OFFICE 30 645 12th Street 31 Hempstead, Texas 77445 32 979-826-7718/979-826-7722 (fax) 33 e.dorsey@wallercounty.us</p> <p>34 ALSO PRESENT:</p> <p>35 Steven Lance</p>	<p>1 EXHIBIT INDEX (continued)</p> <p>2 NO. DESCRIPTION PAGE</p> <p>3 8 Twitter Posts 152</p> <p>4 9 Twitter Post Dated November 4, 2018 156</p> <p>5</p> <p>6</p> <p>7</p> <p>8</p> <p>9</p> <p>10</p> <p>11</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>

PLAINTIFF'S
EXHIBIT

33

Jayla Allen, et al. vs. Waller County Texas, et al.
 Jayla Jenice Allen - 10/11/2019

<p style="text-align: right;">Page 5</p> <p>1 (Witness sworn)</p> <p>2 MR. SEAQUIST: Before we get started, we</p> <p>3 had conferred yesterday and agreed to waive the 30(b)(5)</p> <p>4 reading requirement. I assume that's still agreeable</p> <p>5 for today.</p> <p>6 MS. ADEN: Yes.</p> <p>7 MR. SEAQUIST: And we had also agreed at</p> <p>8 yesterday's depositions that form -- objection to form</p> <p>9 would preserve all objections to the form of the</p> <p>10 question. Can we have that agreement again today?</p> <p>11 MS. ADEN: Yes.</p> <p>12 JAYLA JENICE ALLEN,</p> <p>13 having been first duly sworn, testified as follows:</p> <p>14 EXAMINATION</p> <p>15 BY MR. SEAQUIST:</p> <p>16 Q. Good morning, Ms. Allen.</p> <p>17 A. Good morning.</p> <p>18 Q. My name is Gunnar Seaquist. And I think you</p> <p>19 and I met for the first time yesterday?</p> <p>20 A. That is correct.</p> <p>21 Q. Okay. Have you ever given a deposition before?</p> <p>22 A. I have not.</p> <p>23 Q. You understand that I represent the defendants</p> <p>24 in a lawsuit in which you are a plaintiff?</p> <p>25 A. Yes, I do.</p>	<p style="text-align: right;">Page 7</p> <p>1 A. Yes.</p> <p>2 Q. Okay. I don't anticipate your deposition is</p> <p>3 going to go real long this morning, but it's not a</p> <p>4 marathon. If you need a break at any point, use the</p> <p>5 restroom, get up, stretch your legs, that's just fine.</p> <p>6 Let me know. We can do that. I would only ask that if</p> <p>7 there is a question on the table at the time that you</p> <p>8 answer that question first and then we can take a break.</p> <p>9 Okay?</p> <p>10 A. Yes.</p> <p>11 Q. All right. Also, since we are preserving a</p> <p>12 written record here today, nonverbal cues, you know,</p> <p>13 headshakes or nods, uh-huh and huh-uh, don't come out</p> <p>14 well on a written record. So I'd ask that you please</p> <p>15 answer out loud verbally; and if your answer is yes or</p> <p>16 no, please say yes or no as opposed to uh-huh or huh-uh.</p> <p>17 Okay?</p> <p>18 A. Yes.</p> <p>19 Q. And if for some reason I'm prompting you for</p> <p>20 those, I'm not trying to be rude. I'm just trying to</p> <p>21 get a good record.</p> <p>22 A. I understand.</p> <p>23 Q. Okay. Is there any reason that you would be</p> <p>24 unable today to understand my questions or answer them</p> <p>25 truthfully?</p>
<p style="text-align: right;">Page 6</p> <p>1 Q. And we are here to take your deposition in that</p> <p>2 case this morning.</p> <p>3 A. Yes.</p> <p>4 Q. Okay. Since you haven't given a deposition</p> <p>5 before, just a couple of ground rules. We obviously</p> <p>6 have a court reporter here today who's trying to take</p> <p>7 down everything that you and I say. In fact, she's</p> <p>8 required to write down anything that's said in the room</p> <p>9 while we're on the record.</p> <p>10 So I'm going to ask you to please do your</p> <p>11 very best to let me ask my full question before you</p> <p>12 start your answer; and I, in turn, am going to do my</p> <p>13 very best to let you get your full answer out before I</p> <p>14 ask you another question so that we don't talk over each</p> <p>15 other. Okay?</p> <p>16 A. Okay.</p> <p>17 Q. Also, if at any point today I ask you a</p> <p>18 question that's unclear for any reason or that you don't</p> <p>19 understand what I'm asking you, can we have an agreement</p> <p>20 that you'll ask me to clarify it for you?</p> <p>21 A. Most definitely.</p> <p>22 Q. Okay. Thank you for that.</p> <p>23 And can we also agree that if you do</p> <p>24 answer a question without asking me to clarify it that</p> <p>25 you understood it and gave the best answer you could?</p>	<p style="text-align: right;">Page 8</p> <p>1 A. No.</p> <p>2 Q. Okay. For example, you haven't taken any</p> <p>3 medications that would impair your ability to comprehend</p> <p>4 my questions this morning?</p> <p>5 A. No.</p> <p>6 Q. Are you prepared to proceed with the deposition</p> <p>7 at this point?</p> <p>8 A. I am.</p> <p>9 Q. You're represented by counsel here today?</p> <p>10 A. That is correct.</p> <p>11 Q. Okay. And we have in the room with us Ms. Leah</p> <p>12 Aden from the NAACP Legal Defense Fund, John Cusick also</p> <p>13 from the Legal Defense Fund, and Steven Lance from the</p> <p>14 Legal Defense Fund.</p> <p>15 Have you had an opportunity to meet with</p> <p>16 your counsel before the deposition?</p> <p>17 A. I have.</p> <p>18 Q. Okay. I don't want to know what you talked</p> <p>19 about with them. That's privileged. But can you tell</p> <p>20 me about how long you met with them in anticipation of</p> <p>21 this deposition?</p> <p>22 A. I can't say specifically. I can't remember the</p> <p>23 exact time frame.</p> <p>24 Q. I understand.</p> <p>25 When was the last time you met with</p>

Jayla Allen, et al. vs. Waller County Texas, et al.
 Jayla Jenice Allen - 10/11/2019

<p style="text-align: right;">Page 9</p> <p>1 counsel about the deposition?</p> <p>2 A. Yesterday.</p> <p>3 Q. Okay. Was that for more than an hour?</p> <p>4 A. I would say so.</p> <p>5 Q. Okay. Two hours?</p> <p>6 A. I'm unsure exactly the amount of time.</p> <p>7 Q. Okay. Close enough.</p> <p>8 Other than having an opportunity to confer</p> <p>9 with your counsel, were you able to review any documents</p> <p>10 prior to the deposition today?</p> <p>11 A. I was.</p> <p>12 Q. Okay. What documents did you review to prepare</p> <p>13 for this deposition?</p> <p>14 A. My -- the interrogatories, I believe. Yes.</p> <p>15 Those are all.</p> <p>16 Q. And so we're clear, those are some questions</p> <p>17 that the defendants asked you to answer and that you</p> <p>18 provided some information to respond to.</p> <p>19 A. That is correct.</p> <p>20 Q. Okay. And in providing that information, you</p> <p>21 swore to the truth and accuracy of that information,</p> <p>22 correct?</p> <p>23 A. That is correct.</p> <p>24 Q. Okay. Other than your interrogatory responses,</p> <p>25 were there any other documents that you looked at?</p>	<p style="text-align: right;">Page 11</p> <p>1 A. I have two.</p> <p>2 Q. Brothers or sisters?</p> <p>3 A. Sisters.</p> <p>4 Q. And are they older than you?</p> <p>5 A. Yes.</p> <p>6 Q. Did either of your sisters precede you at</p> <p>7 Prairie View A&M?</p> <p>8 A. They did.</p> <p>9 Q. Both?</p> <p>10 A. Both of them.</p> <p>11 Q. What year did your sisters graduate, if you</p> <p>12 know?</p> <p>13 A. The oldest graduated in 2006; and the middle</p> <p>14 child, she's currently here.</p> <p>15 Q. Okay. What is her anticipated graduation year?</p> <p>16 Do you know?</p> <p>17 A. 2019.</p> <p>18 Q. What does your father do for a living?</p> <p>19 A. He's a coach and behavior specialist with the</p> <p>20 Dallas Independent School District.</p> <p>21 Q. Do you know how long he's been with the DISD?</p> <p>22 A. Roughly a decade and a half.</p> <p>23 Q. Okay. Is your -- what does your mom -- is your</p> <p>24 mom employed?</p> <p>25 A. Yes.</p>
<p style="text-align: right;">Page 10</p> <p>1 A. No.</p> <p>2 Q. Did you bring any documents with you this</p> <p>3 morning to the deposition?</p> <p>4 A. I did not.</p> <p>5 Q. Did you make or did you prepare any notes in</p> <p>6 anticipation of the deposition this morning?</p> <p>7 A. No.</p> <p>8 Q. Let's start with a little bit of background.</p> <p>9 Can you tell me, please, ma'am -- well,</p> <p>10 first of all, can you state your full name for the</p> <p>11 record?</p> <p>12 A. Jayla Jenice Allen.</p> <p>13 Q. And would you spell Jenice?</p> <p>14 A. It's J-e-n-i-c-e.</p> <p>15 Q. Thank you.</p> <p>16 Are there any other names that you go by</p> <p>17 or have gone by?</p> <p>18 A. No.</p> <p>19 Q. Where were you born, please, ma'am?</p> <p>20 A. I was born in Dallas, Texas.</p> <p>21 Q. And what year?</p> <p>22 A. 1999.</p> <p>23 Q. Did you grow up in the Dallas area?</p> <p>24 A. Yes, born and raised.</p> <p>25 Q. Do you have any siblings?</p>	<p style="text-align: right;">Page 12</p> <p>1 Q. What does she do for a living?</p> <p>2 A. She is currently with the Dallas Housing</p> <p>3 Authority, a regional coordinator, I believe.</p> <p>4 Q. Okay. Did both your parents go to college?</p> <p>5 A. They did.</p> <p>6 Q. Okay. Where did your dad go to college?</p> <p>7 A. Prairie View.</p> <p>8 Q. And do you know roughly what year he would have</p> <p>9 graduated?</p> <p>10 A. In '87. '87.</p> <p>11 Q. And your mom, did she also go to Prairie View?</p> <p>12 A. She did.</p> <p>13 Q. Did your parents meet at Prairie View?</p> <p>14 A. They came together.</p> <p>15 Q. And did she graduate around the same time?</p> <p>16 A. In '86.</p> <p>17 Q. Where did you attend high school?</p> <p>18 A. John Horn High School, Mesquite, Texas.</p> <p>19 Q. When did you -- when did your family move from</p> <p>20 Dallas to Mesquite?</p> <p>21 A. Well, we -- let me clarify. We've always lived</p> <p>22 in Mesquite. We lived within the County of Dallas. A</p> <p>23 lot of people don't know where Mesquite is.</p> <p>24 Q. Okay. I understand.</p> <p>25 And what year did you graduate high</p>

Jayla Allen, et al. vs. Waller County Texas, et al.
 Jayla Jenice Allen - 10/11/2019

Page 13	Page 15
<p>1 school?</p> <p>2 A. 2017.</p> <p>3 Q. Are you currently enrolled as a student at</p> <p>4 Prairie View A&M?</p> <p>5 A. I am.</p> <p>6 Q. And what year are you?</p> <p>7 A. Within my third year.</p> <p>8 Q. And from a course credit hour perspective, are</p> <p>9 you a junior?</p> <p>10 A. A senior.</p> <p>11 Q. A senior. Ahead of the game.</p> <p>12 Have you declared a major?</p> <p>13 A. Yes.</p> <p>14 Q. What major?</p> <p>15 A. Political science.</p> <p>16 Q. How did you come to choose Prairie View A&M?</p> <p>17 A. I chose Prairie View because, for one, the</p> <p>18 school and what they offer and what they have to bring</p> <p>19 as in my major, but also, of course, being a legacy and</p> <p>20 my family gone here. I've kind of grown up on Prairie</p> <p>21 View's grounds without being a student. And so within</p> <p>22 my college search, Prairie View just became home and it</p> <p>23 was somewhere where I could grow for the next four</p> <p>24 years.</p> <p>25 Q. Did you apply anywhere else or you knew Prairie</p>	<p>1 other grants to come to school here?</p> <p>2 A. Yes, I received other scholarships.</p> <p>3 Q. Okay. What other scholarships have you</p> <p>4 received?</p> <p>5 A. That's a long list. Numerous ones. I can't</p> <p>6 list them all.</p> <p>7 Q. Are they all just applied to your student</p> <p>8 account or do any of those -- are any of those paid</p> <p>9 directly to you?</p> <p>10 A. Most of them are paid to my student account.</p> <p>11 Q. Okay. Do you pay any of your own tuition out</p> <p>12 of pocket?</p> <p>13 A. No.</p> <p>14 Q. Do your parents provide you any financial</p> <p>15 assistance to pay your tuition?</p> <p>16 A. No.</p> <p>17 Q. Any other family members provide you any</p> <p>18 financial assistance to pay tuition?</p> <p>19 A. No.</p> <p>20 Q. Are you married?</p> <p>21 A. I'm not.</p> <p>22 Q. Do you have any children?</p> <p>23 A. No.</p> <p>24 Q. Are you currently employed?</p> <p>25 A. No, I am not.</p>
Page 14	Page 16
<p>1 View was it for you?</p> <p>2 A. No, I applied to other schools.</p> <p>3 Q. Okay. Other than your parents and your</p> <p>4 sisters, anybody else in your family that's attended</p> <p>5 Prairie View?</p> <p>6 A. My grandfather, my cousins, my uncles, my</p> <p>7 aunts.</p> <p>8 Q. In coming to Prairie View A&M -- throughout the</p> <p>9 deposition today I may say Prairie View A&M or I may say</p> <p>10 PVAMU. We understand those are the same things?</p> <p>11 A. Most definitely.</p> <p>12 Q. Did you receive any scholarship?</p> <p>13 A. From the university itself or just in general?</p> <p>14 Q. Let's start with the university.</p> <p>15 A. Yes, I received one.</p> <p>16 Q. One scholarship? And was that like a tuition</p> <p>17 scholarship?</p> <p>18 A. I don't think it was necessarily granted</p> <p>19 towards a specific just tuition and fees or books or</p> <p>20 anything. It was like a general scholarship.</p> <p>21 Q. And how was that -- I guess does it just -- is</p> <p>22 it just applied to your student account or do you</p> <p>23 actually --</p> <p>24 A. Yeah. Yes.</p> <p>25 Q. Other than from the university, did you get any</p>	<p>1 Q. So what year did you start here at Prairie</p> <p>2 View?</p> <p>3 A. I started in 2017.</p> <p>4 Q. And before coming in 2017, in your</p> <p>5 interrogatory responses, you say you were living at 2600</p> <p>6 Hyacinth Drive in Mesquite?</p> <p>7 A. That is correct.</p> <p>8 Q. Is that your family home?</p> <p>9 A. Yes.</p> <p>10 Q. Okay. You moved to Prairie View in July of</p> <p>11 '17?</p> <p>12 A. That is correct.</p> <p>13 Q. And when you came here, where did you live when</p> <p>14 you first moved to Prairie View?</p> <p>15 A. I lived in University College, Building 42.</p> <p>16 Q. And the address for University College, if I'm</p> <p>17 correct, is given as 100 University Drive?</p> <p>18 A. That's the general one. Yes, that is correct.</p> <p>19 MR. SEAQUIST: I'm going to mark a couple</p> <p>20 of exhibits.</p> <p>21 (Exhibit No. 1 marked)</p> <p>22 Q. (BY MR. SEAQUIST) Ms. Allen, I've marked and</p> <p>23 handed you Exhibit 1 to your deposition. Do you</p> <p>24 recognize Exhibit 1?</p> <p>25 A. I do.</p>

Jayla Allen, et al. vs. Waller County Texas, et al.
 Jayla Jenice Allen - 10/11/2019

Page 17	Page 19
<p>1 Q. And what does this appear to you to be?</p> <p>2 A. The first set of interrogatories.</p> <p>3 Q. Okay. So this is what we were talking about</p> <p>4 earlier in the responses to the interrogatories that you</p> <p>5 provided, correct?</p> <p>6 A. That is correct.</p> <p>7 Q. If you look at page -- the last page of Exhibit</p> <p>8 1, you see a verification page there?</p> <p>9 A. That is correct.</p> <p>10 Q. There is a signature above a signature line</p> <p>11 that says Jayla Allen. Do you see that?</p> <p>12 A. Yes.</p> <p>13 Q. Can you confirm that that is your signature?</p> <p>14 A. That is my signature.</p> <p>15 Q. Okay. And you remember signing this</p> <p>16 verification?</p> <p>17 A. I do.</p> <p>18 Q. Okay. Let me show you one other exhibit.</p> <p>19 (Exhibit No. 2 marked)</p> <p>20 Q. (BY MR. SEAQUIST) I'll hand you what I have</p> <p>21 marked as Exhibit 2.</p> <p>22 A. Thank you.</p> <p>23 Q. Do you recognize Exhibit 2, Ms. Allen?</p> <p>24 A. I do.</p> <p>25 Q. Have you seen this before?</p>	<p>1 housing?</p> <p>2 A. Dormitory.</p> <p>3 Q. Did you live at the University College for the</p> <p>4 entire 2017-2018 school year?</p> <p>5 A. I did.</p> <p>6 Q. Was the cost of that housing covered by your</p> <p>7 scholarships?</p> <p>8 A. It was.</p> <p>9 Q. Did you have a meal plan for the 2017-2018</p> <p>10 school year?</p> <p>11 A. I did.</p> <p>12 Q. And was the meal plan covered by your</p> <p>13 scholarships?</p> <p>14 A. It was.</p> <p>15 Q. Where did that meal plan allow you to eat on</p> <p>16 campus?</p> <p>17 A. In the MSC, which is the Memorial Center --</p> <p>18 Student Memorial Center on campus, also anywhere else on</p> <p>19 campus that took our meal plan.</p> <p>20 Q. Okay. In addition to your scholarships, did</p> <p>21 you receive any financial assistance in 2017-2018 for</p> <p>22 living expenses, spending money, those kinds of things?</p> <p>23 A. From --</p> <p>24 Q. From your family or anyone?</p> <p>25 A. I might have. I can't say specifically.</p>
Page 18	Page 20
<p>1 A. I have.</p> <p>2 Q. And what does it appear to you to be?</p> <p>3 A. A map of my university.</p> <p>4 Q. A map of Prairie View A&M?</p> <p>5 A. Yes, that is correct.</p> <p>6 Q. And does this fairly and accurately depict the</p> <p>7 Prairie View A&M campus?</p> <p>8 A. It does.</p> <p>9 Q. Okay. On the right side of this map, there's a</p> <p>10 legend that's numbered which corresponds to numbered</p> <p>11 buildings on the map; is that right?</p> <p>12 A. Yes.</p> <p>13 Q. If I look in that legend -- and I'll apologize.</p> <p>14 It's not the cleanest copy. But if I look at No. 7, it</p> <p>15 says University College?</p> <p>16 A. Yes.</p> <p>17 Q. And that is where you lived when you first came</p> <p>18 to campus; is that correct?</p> <p>19 A. That is correct.</p> <p>20 Q. And if you see Building 7 here on the map --</p> <p>21 A. Uh-huh.</p> <p>22 Q. -- that fairly and accurately depicts the</p> <p>23 location of University College?</p> <p>24 A. Yes.</p> <p>25 Q. And is that a dormitory or apartment style</p>	<p>1 Q. Okay. You don't -- you didn't get any kind of</p> <p>2 a regular stipend or anything?</p> <p>3 A. Oh, no.</p> <p>4 Q. During the -- during the 2017-2018 school year</p> <p>5 did you ever go back home to Mesquite on weekends?</p> <p>6 A. I'm sure.</p> <p>7 Q. And if you did go back, how would you have</p> <p>8 gotten there?</p> <p>9 A. A family member.</p> <p>10 Q. Did you have a car on campus in 2017-2018?</p> <p>11 A. For the first year, no, I did not.</p> <p>12 Q. When you first got to campus in 2017, you said</p> <p>13 you got here, I think, in July. Is that right?</p> <p>14 A. That is correct.</p> <p>15 Q. Now, school didn't start until when?</p> <p>16 A. Late August.</p> <p>17 Q. What were you doing in Prairie View in the time</p> <p>18 between July when you got here and when school began?</p> <p>19 A. I was in a summer bridge program.</p> <p>20 Q. And can you tell me just kind of what that is?</p> <p>21 A. A summer bridge program is a program that</p> <p>22 allows incoming freshmen to come in and do a program</p> <p>23 that allows them to take classes while also under --</p> <p>24 undergo different activities on campus, including just</p> <p>25 getting accustomed to campus, different meetings and</p>

Jayla Allen, et al. vs. Waller County Texas, et al.
 Jayla Jenice Allen - 10/11/2019

<p style="text-align: right;">Page 21</p> <p>1 seminars with certain students and organizations on 2 campus. 3 Q. Is part of that process sort of an orientation 4 to orient new students to the campus? 5 A. No, that is separate. 6 Q. That's separate. Does that -- does that take 7 place over the summer bridge or does that take place 8 closer to school starting? The orientation. 9 A. The orientation -- new student orientation 10 takes place actually in the semester before. Some do 11 take place over the summer, but those are rather later 12 dates. 13 Q. When you were here in the bridge program, for 14 example, did you get an explanation of where things were 15 around campus? 16 A. Yes. 17 Q. And did you get an explanation of, you know, 18 where certain services and amenities might be located in 19 Prairie View? 20 A. Yes, for the most part. 21 Q. Were you given -- well, let me ask you this. 22 When you came to Prairie View, were you given any 23 information about how to register to vote in Waller 24 County? 25 A. Not when I first arrived, no.</p>	<p style="text-align: right;">Page 23</p> <p>1 Q. And so the county elections office sends -- 2 either Christy Eason or someone from the office comes 3 out to Prairie View to conduct deputy registrar 4 training? 5 A. That is correct. 6 Q. And so your friend who had been deputized 7 through this system told you about how to register 8 for -- to be a voter in Waller County. 9 A. Yes, my classmate did. 10 Q. And how did you actually go about the process 11 of registering? 12 A. Just meeting on campus in a mutual location, 13 which is probably like in one of our classrooms or 14 outside, and doing the application process. 15 Q. Did you -- when you say you went to a meeting, 16 did you go to an actual voter registration event? 17 A. No. I went with her. She was speaking with 18 us -- well, she spoke with some of our classmates on 19 registering to vote; and at a time that worked for both 20 of us, we met and did the application. 21 Q. So your friend had voter registration cards 22 with her? 23 A. My classmate did. 24 Q. Your classmate. 25 A. Uh-huh.</p>
<p style="text-align: right;">Page 22</p> <p>1 Q. So not as part of the bridge program? 2 A. No. That was never included from my 3 understanding or my knowledge. 4 Q. When did you -- or how did you learn ultimately 5 how to register to vote -- let me ask you another 6 question first. 7 Had you ever registered to vote in Dallas 8 County? 9 A. I had not. 10 Q. So you registered to vote for the first time in 11 Waller County. 12 A. That is correct. 13 Q. How did you learn how to register to vote in 14 Waller County? 15 A. Through a mutual -- a classmate, I guess you 16 would say. 17 Q. And how did you come to learn from this 18 classmate how to register to vote? 19 A. She was deputized in registering people to vote 20 and I needed to register to vote. 21 Q. So she had taken the deputy registrar training? 22 A. That is correct. 23 Q. And you understand that training is provided by 24 the county elections office? 25 A. I'm aware.</p>	<p style="text-align: right;">Page 24</p> <p>1 Q. And you filled out your voter registration 2 card. Did you mail it yourself? 3 A. No. 4 Q. She mailed it in for you? 5 A. Yes. 6 Q. Do you remember roughly in 2017 when it was 7 that you registered to vote? 8 A. It was in the fall semester. I'm not exactly 9 sure of the date and time. 10 Q. Would it have been before the 2017 -- or would 11 it have been in time to vote in the 2017 November 12 election? 13 A. No. 14 Q. In filling out your registration card, did you 15 use the 100 University address? 16 A. I believe so. 17 Q. And was that what your classmate told you to 18 use or that's just -- you knew what your address at the 19 dormitory was so that's why you used it? 20 A. I'm not sure if it was just from my knowledge 21 or her telling me. It was awhile ago. 22 Q. Okay. And did you receive a card confirming 23 your registration in the mail? 24 A. I did. 25 Q. Did you have any difficulties registering to</p>

Jayla Allen, et al. vs. Waller County Texas, et al.
 Jayla Jenice Allen - 10/11/2019

<p style="text-align: right;">Page 25</p> <p>1 vote?</p> <p>2 A. No.</p> <p>3 Q. Do you know what voting precinct you lived in</p> <p>4 when you were on -- when you were living on campus at</p> <p>5 the University College?</p> <p>6 A. I did.</p> <p>7 Q. What precinct was it?</p> <p>8 A. 309.</p> <p>9 Q. All right. So you told me that you were 18 at</p> <p>10 the time of the November election, but you had -- well,</p> <p>11 let me ask you. Were you 18 at the time?</p> <p>12 A. I was.</p> <p>13 Q. Okay. But you did not get registered prior to</p> <p>14 the November 2017 election.</p> <p>15 A. I did not.</p> <p>16 Q. And so you didn't vote in that election.</p> <p>17 A. I did not.</p> <p>18 Q. Do you remember the subject of the 2017</p> <p>19 November election?</p> <p>20 A. Not -- not to speak on, no.</p> <p>21 Q. Do you remember there being at some point in</p> <p>22 time a jail bond election?</p> <p>23 A. Yes.</p> <p>24 Q. Okay. And so you didn't vote in that election.</p> <p>25 Did you participate or attend in any election-related</p>	<p style="text-align: right;">Page 27</p> <p>1 to where that new jail would be constructed?</p> <p>2 A. Yes.</p> <p>3 Q. And where was that?</p> <p>4 A. I can't remember exactly.</p> <p>5 Q. Did you participate in any voter registration</p> <p>6 drives in advance of the 2017 November election?</p> <p>7 A. No.</p> <p>8 Q. Did you campaign in any way for or against the</p> <p>9 jail bond?</p> <p>10 A. I can't say that I did or didn't necessarily.</p> <p>11 Q. Your interrogatories say that you were -- or --</p> <p>12 well, are you currently a member of the PVAMU Panther</p> <p>13 Party?</p> <p>14 A. I am.</p> <p>15 Q. When did you first sign up as a member?</p> <p>16 A. 2018.</p> <p>17 Q. So at the time of this jail bond election, you</p> <p>18 were not a member of The Panther Party.</p> <p>19 A. No.</p> <p>20 Q. Do you remember specifically attending any</p> <p>21 Panther Party events or activities leading up to the</p> <p>22 jail bond election?</p> <p>23 A. No.</p> <p>24 Q. Did you attend any meetings of the -- if I say</p> <p>25 the Waller County Commissioners Court, you know the body</p>
<p style="text-align: right;">Page 26</p> <p>1 events leading up to the jail bond election?</p> <p>2 A. I'm sure. I can't speak on the exact ones or</p> <p>3 what dates or where they might have been that I was</p> <p>4 engaged on.</p> <p>5 Q. Can you tell me generally what kind of</p> <p>6 activities you remember participating in as it relates</p> <p>7 to the jail bond election?</p> <p>8 A. I think just like general meetings or having</p> <p>9 conversations among the student body with those</p> <p>10 informing us on the election that was coming up; and of</p> <p>11 course, the big talk was the jail bond.</p> <p>12 Q. What did you understand the jail bond election</p> <p>13 to be?</p> <p>14 A. That it was time -- that a voting -- that it</p> <p>15 was time to vote, there was an election, and that one of</p> <p>16 the things that was being talked about or being voted on</p> <p>17 was the jail bond.</p> <p>18 Q. And did you have an understanding of what the</p> <p>19 jail bond would do?</p> <p>20 A. Yes.</p> <p>21 Q. And what was that understanding?</p> <p>22 A. The bond was going to be spent to build a new</p> <p>23 jail within the county.</p> <p>24 Q. And did you -- was there discussion on the</p> <p>25 Prairie View campus that you were a part of or heard as</p>	<p style="text-align: right;">Page 28</p> <p>1 I'm talking about?</p> <p>2 A. Yes.</p> <p>3 Q. Did you attend any meetings of the Waller</p> <p>4 County Commissioners Court in the fall of 2017 leading</p> <p>5 up to the jail bond election?</p> <p>6 A. I did not.</p> <p>7 Q. Did you talk to or otherwise communicate -- and</p> <p>8 by that, I mean e-mail, text -- with any officials or</p> <p>9 employees of Waller County in advance of the 2017 jail</p> <p>10 bond election?</p> <p>11 A. I did not.</p> <p>12 Q. Did you advocate in any way for voting</p> <p>13 locations as it relates to the November 2017 election?</p> <p>14 A. Not to my knowledge.</p> <p>15 Q. What about -- same question. Did you advocate</p> <p>16 in any way for voting hours as it related to the 2017</p> <p>17 jail bond election?</p> <p>18 A. No.</p> <p>19 Q. Understanding that you did not vote in the 2017</p> <p>20 election yourself, did you ever go to a polling</p> <p>21 location, for example, when someone else went to vote?</p> <p>22 A. For 2017?</p> <p>23 Q. For 2017.</p> <p>24 A. No.</p> <p>25 Q. Were you aware of any voting difficulties at</p>

Jayla Allen, et al. vs. Waller County Texas, et al.
 Jayla Jenice Allen - 10/11/2019

<p style="text-align: right;">Page 29</p> <p>1 Prairie View for students casting their ballots in that 2 2017 jail bond election? 3 A. I wouldn't necessarily say for twenty -- that 4 specific voting time, but I knew that there had been 5 times where there has been difficulties for students 6 voting. 7 Q. Okay. So previously there have been issues, 8 but you're not aware of anything specifically as it 9 relates to 2017. 10 A. I can't speak specifically on 2017. No, I 11 cannot. 12 Q. Okay. Tell me generally what you understood 13 the earlier difficulties to be as it relates to students 14 being able to cast a ballot. 15 A. Difficulties with the address, difficulties 16 with students being able to vote on campus, also them 17 having a central location on campus. And for the most 18 part, that sums it up. 19 Q. Okay. What -- according to your 20 interrogatories, the first election that you voted in 21 was the primary in March of 2018. Is that right? 22 A. Yes, that sounds correct. 23 Q. And did you vote in the Democrat or the 24 Republican primary? 25 A. Democratic.</p>	<p style="text-align: right;">Page 31</p> <p>1 Q. Are you a member of the Democratic club in 2 Waller County? 3 A. Yes. I hadn't filled out any prior information 4 for them, so -- 5 Q. The classmate that helped you to register, 6 was -- I keep saying it's a she. Am I correct that it 7 was a she? 8 A. Yes, it is. You are correct. She is a she. 9 Q. Okay. Was she affiliated with any groups or 10 organizations? 11 A. Many. I can't name them all. 12 Q. Was she a member of the Waller County 13 Democratic Club? 14 A. I can't say that she was or she wasn't. 15 Q. When she was there discussing registration with 16 you and, I assume, your other classmates -- 17 A. Uh-huh. 18 Q. -- was she there in her capacity as a 19 representative of any of those other -- of any 20 organization? 21 A. No. She was just a student. We actually had 22 class together. 23 Q. Okay. 24 A. So it wasn't a formal meeting that was held. 25 It was more so just a conversation that was started.</p>
<p style="text-align: right;">Page 30</p> <p>1 Q. Now, in fact, it looks like in December of 2017 2 you were actually chosen as the Democratic precinct 3 chair for your precinct, which was 309. Is that right? 4 A. That is correct. 5 Q. And 309 is the precinct that covers the Prairie 6 View A&M campus? 7 A. That is correct. 8 Q. How did you come to be elected the precinct 9 chair? 10 A. Well, formally I filled out an application 11 through the County. But I was actually looking to get 12 more involved on campus with voting, looking at the bond 13 election, the voting bond election, and getting a chance 14 to become more civically engaged and engage the students 15 on campus. 16 Q. So when you came to Prairie View, did you have 17 a preexisting understanding of how the voting precinct 18 system worked? 19 A. I didn't have great knowledge of it. 20 Q. How did you come to learn that there was a 21 Democratic chair for the precinct and that that was a 22 position that you could apply for? 23 A. One was my classmate, the same person who 24 registered me to vote, and also the Democratic club 25 within Waller County.</p>	<p style="text-align: right;">Page 32</p> <p>1 Q. And so this classmate later informed you that 2 there was a precinct chair that the Democratic party -- 3 that there was a Democratic party precinct chair for 309 4 and that you could apply for that position. 5 A. She did, as well as the club, a representative 6 from the club. 7 Q. And did the classmate actually encourage you to 8 apply for that position? 9 A. I can't say that she did or she didn't. 10 Q. Do you know whether the Democratic club of 11 Waller County encouraged you to apply for that position? 12 A. I can't say that they did or didn't. 13 Q. Do you remember when you filled out the 14 application to be the Democratic precinct chair? 15 A. I remember. 16 Q. When was that? 17 A. I can't speak on the exact date. I know it was 18 within, of course, the November, December time frame. 19 Q. So after the 2017 election you filled out the 20 application. 21 A. That is correct. 22 Q. And how -- what is your understanding of how 23 the Democratic precinct chair is chosen? 24 A. From my understanding, if there is a -- if 25 there's more than one person running, then you go off as</p>

Jayla Allen, et al. vs. Waller County Texas, et al.
 Jayla Jenice Allen - 10/11/2019

<p style="text-align: right;">Page 33</p> <p>1 an election. If not, then you have the opportunity to 2 be appointed the position. 3 Q. At the time you applied, was anybody else 4 running? 5 A. From my understanding, there was, or there was 6 going to be. 7 Q. Do you know whether there was an election for 8 your -- the position that you ultimately assumed? 9 A. From my understanding, there was not. 10 Q. So your understanding is that you were 11 appointed in that role. 12 A. That is correct. 13 Q. Do you have an understanding as to who made 14 that appointment? 15 A. Rosa Harris. 16 Q. Which person from the Democratic club of Waller 17 County was the one who discussed the precinct chair 18 position for you? 19 A. Rosa Harris. 20 Q. How did you first meet Ms. Harris? 21 A. My first time meeting her was at that time of 22 completing my application. 23 Q. So -- but was she part of the club that 24 encouraged -- or that gave you the information about how 25 to apply?</p>	<p style="text-align: right;">Page 35</p> <p>1 first time the university is being represented in the 2 county's top Democratic governing body, the Waller 3 County Democratic Executive Committee." 4 Do you see that? 5 A. I do. 6 Q. Do you agree with that statement? 7 A. Yes. 8 Q. And is it true that you were the first Prairie 9 View student who served as a precinct chair? 10 A. That is correct. 11 Q. And did you believe, in your role as the 12 Democratic precinct chair, that your responsibility was 13 to represent all of the university students? 14 A. Yes. I would say yes. 15 Q. Do you -- well, I assume you identify as a 16 Democrat. 17 A. I do. 18 Q. Are you a member of the Democratic party? 19 A. Yes. 20 Q. You told me that you at least attended some 21 Waller County Democratic Club meetings. Are you 22 officially a member of that club? 23 A. I believe, as a precinct chair, I was; but I 24 didn't necessarily take out membership outside of my 25 role of precinct chair.</p>
<p style="text-align: right;">Page 34</p> <p>1 A. Yes, she was a part of the club. 2 Q. Okay. I guess my question is: Had you met her 3 at any point before going to the Democratic party club 4 meeting? 5 A. I had not. 6 Q. And at that time Ms. Harris had given you that 7 information about the precinct chair position, she was 8 the chair of the Democratic party for Waller County, 9 correct? 10 A. I believe so, yes. 11 MR. SEAQUIST: I'm going to mark Exhibit 12 3. 13 (Exhibit No. 3 marked) 14 Q. (BY MR. SEAQUIST) Do you recognize what I've 15 marked as Exhibit 3? 16 A. I do. 17 Q. And who is Darrell Allen? 18 A. My father. 19 Q. Okay. So this appears to be a tweet from your 20 dad announcing your election as the precinct chair; is 21 that correct? 22 A. It is -- it's a Facebook post. 23 Q. Oh, it's a Facebook post. 24 A. That is correct. 25 Q. Okay. In your dad's post, he says "For the</p>	<p style="text-align: right;">Page 36</p> <p>1 Q. Okay. Is there a Waller County Democratic 2 party organization? 3 A. Outside of the club? 4 Q. Yes. 5 A. Not that I know of. 6 Q. Okay. 7 A. Or affiliated with. 8 Q. In your dad's Facebook post, he also includes a 9 quote from Rosa Patlan Harris. Do you know where that 10 quote initially appeared? It looks like he took that 11 from somewhere. 12 A. Yes. It was through an e-mail or message sent 13 from Rosa herself. 14 Q. Do you know to whom? 15 A. To me. 16 Q. To you. 17 So it says "'Ms. Allen's enthusiasm, level 18 headedness, knowledge, persistence, and family history 19 with PVAMU makes her an asset to our committee. I am 20 looking forward to working with her' said Democratic 21 Party County Chair, Rosa Patlan Harris." 22 That sounds kind of more like a public 23 announcement or press release. Do you know? Was there 24 a press release about your -- 25 A. I don't believe that there was ever a formal</p>

Jayla Allen, et al. vs. Waller County Texas, et al.
 Jayla Jenice Allen - 10/11/2019

Page 37	Page 39
<p>1 one or not.</p> <p>2 Q. Okay. And did you understand, in your role as</p> <p>3 the precinct chair, that you would, in fact, be working</p> <p>4 with Ms. Harris?</p> <p>5 A. Yes.</p> <p>6 Q. Tell me, once you -- well, what was -- I</p> <p>7 apologize.</p> <p>8 How long were you -- was your term as the</p> <p>9 precinct chair for 309?</p> <p>10 A. I believe it was two years.</p> <p>11 Q. Two years.</p> <p>12 A. Or it is two years.</p> <p>13 Q. So you are still, as we sit here today,</p> <p>14 currently the precinct chair for Precinct 309?</p> <p>15 A. Yes. My two-year term would have been -- well,</p> <p>16 will be December 11th, 2019.</p> <p>17 Q. What activities do you conduct as part of your</p> <p>18 role as the precinct chair in 309?</p> <p>19 A. Voter registration, voter registration</p> <p>20 workshops, one-on-one registration, education amongst</p> <p>21 the student body, participate in any civic engagements</p> <p>22 or political meetings, activities, or partner with other</p> <p>23 organizations around those subjects in getting our</p> <p>24 student body engaged.</p> <p>25 Q. As a precinct chair, you have a place on the</p>	<p>1 A. Anywhere roughly between 10 to 15.</p> <p>2 Q. And have any of the other attendees identified</p> <p>3 themselves to you?</p> <p>4 A. They have, I'm sure.</p> <p>5 Q. And have any of them introduced themselves to</p> <p>6 you as a precinct chair?</p> <p>7 A. Not from my knowledge.</p> <p>8 Q. Does Ms. Harris run the meetings?</p> <p>9 A. Not -- no, not solely.</p> <p>10 Q. Who runs the meetings?</p> <p>11 A. Usually -- it depends. It wasn't -- from the</p> <p>12 meetings that I have attended, it was never just one</p> <p>13 person. It was actually multiple people. And I'm</p> <p>14 guessing that it's from -- or from my knowledge, it's</p> <p>15 due to the different parts that everyone has in whether</p> <p>16 it's fundraising, what's on the agenda, bringing up</p> <p>17 specific things within the meeting.</p> <p>18 Q. So when there are agenda items in the meeting,</p> <p>19 certain individuals will be responsible for a particular</p> <p>20 item; is that true?</p> <p>21 A. Yes.</p> <p>22 Q. Is there also general discussion among all the</p> <p>23 attendees about the particular agenda items?</p> <p>24 A. I would say that there is.</p> <p>25 Q. So there's an opportunity for input from all</p>
Page 38	Page 40
<p>1 Waller County Democratic executive committee; is that</p> <p>2 right?</p> <p>3 A. That is correct.</p> <p>4 Q. How often does that committee meet?</p> <p>5 A. I believe at least once a month or every other</p> <p>6 month.</p> <p>7 Q. And have you attended all of those meetings?</p> <p>8 A. I have not attended all of them, no.</p> <p>9 Q. Where do they meet?</p> <p>10 A. I believe the headquarters of Waller County. I</p> <p>11 know that it has changed before.</p> <p>12 Q. And what takes place at those meetings?</p> <p>13 A. An agenda speaking on what's coming up, what</p> <p>14 they're trying to do, fundraisers. I haven't attended</p> <p>15 very many of those meetings due to lack of</p> <p>16 transportation, working.</p> <p>17 Q. Is there an opportunity for the precinct</p> <p>18 chair -- well, are all of the Democratic precinct chairs</p> <p>19 on that committee?</p> <p>20 A. I can't say that they are or they aren't.</p> <p>21 Q. Do you know whether there are other chairs of</p> <p>22 other precincts that also attend those meetings?</p> <p>23 A. I can't say that they do or they don't.</p> <p>24 Q. For the meetings that you've been to, how many</p> <p>25 people have attended them?</p>	<p>1 the attendees on any given agenda item?</p> <p>2 A. Yes.</p> <p>3 Q. Do you remember who you supported in the</p> <p>4 Democratic primary in 2018?</p> <p>5 A. No, I do not.</p> <p>6 Q. Were you a Beto O'Rourke supporter?</p> <p>7 A. I can't say that I was or that I wasn't.</p> <p>8 Q. Did you do any campaigning for a candidate in</p> <p>9 the 2018 primary?</p> <p>10 A. No, I did not.</p> <p>11 Q. And I mean that not just in statewide races but</p> <p>12 local races, too.</p> <p>13 A. No. I refrained from necessarily campaigning</p> <p>14 for anyone as precinct chair.</p> <p>15 Q. I understand.</p> <p>16 A. But I did attend events for different</p> <p>17 candidates and people who were running.</p> <p>18 Q. Okay. And you testified a little while ago</p> <p>19 that your responsibility as a precinct chair included</p> <p>20 doing voter registration drives. Did you participate in</p> <p>21 voter registration drives for the 2018 primary?</p> <p>22 A. I did.</p> <p>23 Q. Did you feel those were fairly successful?</p> <p>24 A. I did.</p> <p>25 Q. Okay. Did you participate in any informational</p>

Jayla Allen, et al. vs. Waller County Texas, et al.
 Jayla Jenice Allen - 10/11/2019

<p style="text-align: right;">Page 41</p> <p>1 sessions about the primary election?</p> <p>2 A. I'm sure.</p> <p>3 Q. Do you remember attending, for example, any</p> <p>4 candidate forums?</p> <p>5 A. Yes.</p> <p>6 Q. Do you remember who -- which candidates were</p> <p>7 present at those forums?</p> <p>8 A. No.</p> <p>9 Q. When you go to a candidate forum, you -- let me</p> <p>10 back up for a second.</p> <p>11 So you're the Democratic precinct chair</p> <p>12 for Waller County -- or excuse me, for Precinct 309.</p> <p>13 A. That is correct.</p> <p>14 Q. You are a member of The Panther Party.</p> <p>15 A. That is correct.</p> <p>16 Q. And I think I saw that you were also --</p> <p>17 participated in the Student Government Association?</p> <p>18 A. Yes.</p> <p>19 Q. When did you begin your Student Government</p> <p>20 Association participation?</p> <p>21 A. 2018, fall.</p> <p>22 Q. Okay. So at the time of the primary in 2018,</p> <p>23 which would have been the spring, you had not yet joined</p> <p>24 the Student Government Association.</p> <p>25 A. That is correct.</p>	<p style="text-align: right;">Page 43</p> <p>1 just trying to get, you know, your best recollection of</p> <p>2 what you know right now.</p> <p>3 A. Thank you.</p> <p>4 Q. My assumption is what you know right now is</p> <p>5 what you'll know at trial. So this is my opportunity to</p> <p>6 ask you questions so that we know kind of what your</p> <p>7 trial testimony will be. Okay?</p> <p>8 A. Okay.</p> <p>9 Q. You had said a couple of times -- you used the</p> <p>10 phrase "101". What were you talking about there?</p> <p>11 A. Just as in if I'm walking from class, I see a</p> <p>12 peer, a student, and we have a one-on-one conversation</p> <p>13 and it might include any of those things. That's more</p> <p>14 so one-on-one that I would speak on.</p> <p>15 Q. So 101, is that kind of a reference to -- oh,</p> <p>16 one-on-one. I apologize. I was hearing 101 and you</p> <p>17 were saying one-on-one.</p> <p>18 A. I apologize.</p> <p>19 (Discussion off the record)</p> <p>20 Q. (BY MR. SEAQUIST) Are you familiar with a</p> <p>21 voter-only party?</p> <p>22 A. I am.</p> <p>23 Q. The evidence in this case has suggested there</p> <p>24 was a voter-only party in April of 2018 after the</p> <p>25 primary.</p>
<p style="text-align: right;">Page 42</p> <p>1 Q. At that time you were the precinct chair. Had</p> <p>2 you already joined The Panther Party at that point?</p> <p>3 A. No.</p> <p>4 Q. Do you remember --</p> <p>5 A. It was -- I can't remember specifically the,</p> <p>6 like, month when I joined.</p> <p>7 Q. Okay. When there is a candidate forum, for</p> <p>8 example, for the March primary in 2018 on campus, is</p> <p>9 that hosted by any singular group?</p> <p>10 A. I can't say that it was or that it wasn't. I</p> <p>11 don't remember.</p> <p>12 Q. Okay. Do you know if sometimes groups work in</p> <p>13 cooperation to host an event like that?</p> <p>14 A. Yes.</p> <p>15 Q. Do you remember if you participated in any of</p> <p>16 the get out the vote activities for the March 2018</p> <p>17 primary?</p> <p>18 A. I did.</p> <p>19 Q. And what type of activity -- get out the vote</p> <p>20 functions were there that you participated in?</p> <p>21 A. I can't remember exactly. But there was</p> <p>22 different meetings, I'm pretty sure, like one-on-one</p> <p>23 conversations with peers and colleagues. I can't really</p> <p>24 say exactly. That was awhile ago.</p> <p>25 Q. I understand that. And by the way, today I'm</p>	<p style="text-align: right;">Page 44</p> <p>1 A. That is correct.</p> <p>2 Q. Do you remember -- did you attend that party?</p> <p>3 A. I did not.</p> <p>4 Q. Did you attend any meeting -- any meetings --</p> <p>5 let me start over.</p> <p>6 Did you attend any Panther Party events or</p> <p>7 activities in advance of the 2018 primary?</p> <p>8 A. I probably did. I can't say that -- which</p> <p>9 events or meetings exactly.</p> <p>10 Q. Can you tell me generally the types of events</p> <p>11 The Panther Party would participate in in advance of an</p> <p>12 election?</p> <p>13 A. I would say anything that involves civic</p> <p>14 engagement, voter registration, voter education,</p> <p>15 anything to engage the students in civic engagement or</p> <p>16 political activity.</p> <p>17 Q. Did you attend any meetings of the Waller</p> <p>18 County Commissioners Court in advance of the 2018</p> <p>19 primary?</p> <p>20 A. I did not.</p> <p>21 Q. Did you talk to or otherwise communicate,</p> <p>22 again, text, e-mail, with any officials or employees of</p> <p>23 Waller County in advance of the 2018 primary?</p> <p>24 A. Those of the Commissioners Court or just Waller</p> <p>25 County officials?</p>

Jayla Allen, et al. vs. Waller County Texas, et al.
 Jayla Jenice Allen - 10/11/2019

Page 45	Page 47
<p>1 Q. Let's start with the Commissioners Court.</p> <p>2 A. No, I did not.</p> <p>3 Q. All right. What about the election</p> <p>4 administrator, Christy Eason?</p> <p>5 A. No, I -- no.</p> <p>6 Q. Is there -- well, let me ask it maybe the other</p> <p>7 way around, which is: Were there any officials of</p> <p>8 Waller County that you remember talking to about the</p> <p>9 2018 primary?</p> <p>10 A. I can't say that I do remember.</p> <p>11 Q. Do you know who Judge Marian Jackson is?</p> <p>12 A. I do.</p> <p>13 Q. She was a candidate in the 2018 election,</p> <p>14 correct?</p> <p>15 A. Yes.</p> <p>16 Q. Was she running for reelection?</p> <p>17 A. I believe so.</p> <p>18 Q. Do you remember whether she had a primary</p> <p>19 opponent?</p> <p>20 A. I can't say that I do or I don't.</p> <p>21 Q. Do you remember having any conversations with</p> <p>22 Judge Jackson in advance of the 2018 primary?</p> <p>23 A. No, I don't remember if I had or if I hadn't.</p> <p>24 Q. Other than the people that we have discussed,</p> <p>25 you don't remember talking to anybody with Waller County</p>	<p>1 A. At a meeting, are you asking?</p> <p>2 Q. Well, let's say just, first of all, in general</p> <p>3 and then we'll talk about how it might take place.</p> <p>4 A. That is correct.</p> <p>5 Q. Do you know -- does that occur at a meeting?</p> <p>6 A. No, not -- not that I've heard of or have been</p> <p>7 in attendance to hear.</p> <p>8 Q. Okay. Is it possible that that has occurred at</p> <p>9 a meeting in which you were not in attendance?</p> <p>10 A. I highly doubt it.</p> <p>11 Q. Do you know one way or the other, though?</p> <p>12 A. I'm sorry. Can you repeat the question?</p> <p>13 Q. Yes.</p> <p>14 Do you know one way or the other for sure?</p> <p>15 A. No.</p> <p>16 Q. Okay. Now, you did vote in the 2018 primary?</p> <p>17 A. Yes.</p> <p>18 Q. And your interrogatories say that you voted at</p> <p>19 the Memorial Student Center at Prairie View A&M.</p> <p>20 A. That is correct.</p> <p>21 Q. Do you remember whether you voted early or on</p> <p>22 the primary election day?</p> <p>23 A. I do not remember exactly.</p> <p>24 Q. Do you remember roughly what time of the day</p> <p>25 you cast a ballot in the March 2018 primary?</p>
Page 46	Page 48
<p>1 as it relates to the 2018 primary.</p> <p>2 A. If I had, I don't remember.</p> <p>3 Q. Did you advocate in any way for additional</p> <p>4 voting locations for the 2018 primary?</p> <p>5 A. I did not.</p> <p>6 Q. Did you advocate in any way for additional</p> <p>7 voting hours in the 2018 primary?</p> <p>8 A. I did not.</p> <p>9 Q. Did you attend the Democratic executive</p> <p>10 committee meetings leading up to the 2018 primary?</p> <p>11 A. I don't remember if I did.</p> <p>12 Q. Do you recall whether voting hours and</p> <p>13 locations were discussed at the -- any of the meetings</p> <p>14 that you attended for the Waller County executive</p> <p>15 committee -- or the Democratic executive committee</p> <p>16 before the March '18 primary?</p> <p>17 A. No.</p> <p>18 Q. And that's a no, you don't recall?</p> <p>19 A. Yes, that is correct.</p> <p>20 Q. You understand that the primaries are actually</p> <p>21 run by the particular political parties, correct?</p> <p>22 A. Yes.</p> <p>23 Q. And so in terms of the proposed hours for</p> <p>24 voting, that's something that would be proposed by the</p> <p>25 Democratic party chair.</p>	<p>1 A. I do not.</p> <p>2 Q. Do you remember how you got to the student</p> <p>3 center to cast your ballot?</p> <p>4 A. Yes.</p> <p>5 Q. How would you have gotten there?</p> <p>6 A. I walked.</p> <p>7 Q. Do you remember -- and I know it's been awhile,</p> <p>8 so just tell me. Do you remember, for the March</p> <p>9 primary, where you walked from to cast your ballot?</p> <p>10 A. I believe class.</p> <p>11 Q. Do you know what class you had immediately</p> <p>12 before you cast your ballot?</p> <p>13 A. No.</p> <p>14 Q. Do you remember how long it took you to vote in</p> <p>15 the March 2018 primary?</p> <p>16 A. I can't say exactly, no.</p> <p>17 Q. Do you remember it being a long time?</p> <p>18 A. I don't remember or recall. I'm sure I was</p> <p>19 waiting.</p> <p>20 Q. I guess my question is: It doesn't stick out</p> <p>21 in your mind as we sit here today as being any of a</p> <p>22 long -- a very long wait.</p> <p>23 A. Not personally, no. Other students might have.</p> <p>24 Q. Okay. You personally didn't have -- did you</p> <p>25 have any difficulty casting your ballot?</p>

Jayla Allen, et al. vs. Waller County Texas, et al.
 Jayla Jenice Allen - 10/11/2019

<p style="text-align: right;">Page 49</p> <p>1 A. I did not.</p> <p>2 Q. Was there any issue with your registration in</p> <p>3 the primary?</p> <p>4 A. No, not for that one.</p> <p>5 Q. Did any other students express to you in your</p> <p>6 role as -- well, let me ask you this. As the 309</p> <p>7 precinct chair, what -- what were your responsibilities</p> <p>8 in terms of the actual conduct of voting?</p> <p>9 A. Can you rephrase the question?</p> <p>10 Q. Certainly.</p> <p>11 Were you expected to be present in the</p> <p>12 polling location at the time of voting?</p> <p>13 A. That was not my -- those were not my</p> <p>14 expectations; and if they were, they were never</p> <p>15 expressed to me.</p> <p>16 Q. Okay. Did you attend to monitor in any way</p> <p>17 early voting for the 2018 primary?</p> <p>18 A. No, I did not.</p> <p>19 Q. What about on election day? Did you monitor</p> <p>20 voting at all?</p> <p>21 A. No, I did not.</p> <p>22 Q. In your role as the precinct chair for 309, did</p> <p>23 anyone voice any complaints or concerns about</p> <p>24 difficulties voting in the 2018 primary?</p> <p>25 A. They did.</p>	<p style="text-align: right;">Page 51</p> <p>1 A. That is correct.</p> <p>2 Q. So in terms of your actual precinct assignment,</p> <p>3 that's really only important as it relates to election</p> <p>4 day voting, correct?</p> <p>5 A. I wouldn't agree.</p> <p>6 Q. Okay. In terms of being able to vote, whether</p> <p>7 you're assigned to Precinct 309 or 310, for early</p> <p>8 voting, you can vote at either, correct?</p> <p>9 A. That is correct.</p> <p>10 Q. So on election day, if you are assigned to 310,</p> <p>11 then you're required to vote in 310, correct?</p> <p>12 A. That is correct.</p> <p>13 Q. For students who live off of campus --</p> <p>14 A. Uh-huh.</p> <p>15 Q. -- do you know what precinct they live in?</p> <p>16 A. It depends where they live and how the line is</p> <p>17 drawn into what precinct they live in.</p> <p>18 Q. If they live in Prairie View and they are not</p> <p>19 on campus, would you agree with me that they are</p> <p>20 generally going to live in Precinct 310?</p> <p>21 A. For the most part, yes.</p> <p>22 Q. And so if you're an off-campus student and you</p> <p>23 live in Precinct 310, you can vote on campus during</p> <p>24 early voting, but you'd have to vote in the 310 precinct</p> <p>25 on election day, correct?</p>
<p style="text-align: right;">Page 50</p> <p>1 Q. And what concerns did you hear?</p> <p>2 A. Problems with their address, registration being</p> <p>3 valid, and actually being able to vote during that</p> <p>4 election, also students who live off campus being able</p> <p>5 to vote.</p> <p>6 Q. Okay. Okay. So the problems with the address,</p> <p>7 what is your understanding of what the problems with</p> <p>8 addressing were taking place as it relates to the 2018</p> <p>9 primary election?</p> <p>10 A. One of them, speaking on the students that</p> <p>11 lived off campus and being in different precincts, that</p> <p>12 was one. Also, with students who did live on campus, I</p> <p>13 think that was the first time I heard about the</p> <p>14 difference from using like 100 and 700 University Drive.</p> <p>15 So it was different for when other students versus other</p> <p>16 students coming and having different ones on their --</p> <p>17 for their registration.</p> <p>18 Q. Okay. So as the Democratic precinct chair for</p> <p>19 309, do you have an understanding as to whether you are</p> <p>20 required to vote in the precinct in which you are</p> <p>21 registered for early voting?</p> <p>22 A. Can you repeat the question?</p> <p>23 Q. Yes. Maybe I can say it an easier way.</p> <p>24 For early voting, you're allowed to vote</p> <p>25 in any precinct, correct?</p>	<p style="text-align: right;">Page 52</p> <p>1 A. That is correct.</p> <p>2 Q. If you live on campus, you can vote on -- in</p> <p>3 309 on early voting or on election day, correct?</p> <p>4 A. That is correct.</p> <p>5 Q. All right. Now, there was some confusion. You</p> <p>6 mentioned the 100 versus 700 address issue.</p> <p>7 A. Uh-huh. That was the first problem with</p> <p>8 addresses.</p> <p>9 Q. If you were registered using the -- well, let</p> <p>10 me back up.</p> <p>11 There is not mail delivery to individual</p> <p>12 residences on campus, correct?</p> <p>13 A. No, there is not.</p> <p>14 Q. There is a central mailroom where all the</p> <p>15 students' mail goes.</p> <p>16 A. That is correct.</p> <p>17 Q. And when a student gets mail, they get some</p> <p>18 kind of a notification and then they themselves go and</p> <p>19 pick up their mail.</p> <p>20 A. That is correct.</p> <p>21 Q. All right. So as in the dorm that you lived</p> <p>22 in, dorms are assigned a university address, right?</p> <p>23 A. That is correct.</p> <p>24 Q. And 100 University Avenue is a -- one of the</p> <p>25 university addresses, correct?</p>

Jayla Allen, et al. vs. Waller County Texas, et al.
 Jayla Jenice Allen - 10/11/2019

<p style="text-align: right;">Page 53</p> <p>1 A. Yes.</p> <p>2 Q. And the other one is 700 University Avenue; is</p> <p>3 that right?</p> <p>4 A. Well, now we know that it's not.</p> <p>5 Q. Okay. 100 University Avenue is for sure on</p> <p>6 campus, correct?</p> <p>7 A. Yes.</p> <p>8 Q. And so if you are a Prairie View student and</p> <p>9 you registered to vote using the 100 University Avenue,</p> <p>10 you didn't have any registration problems, correct?</p> <p>11 A. I personally didn't, but I can't speak to the</p> <p>12 other students who might have or might not have had</p> <p>13 under that address.</p> <p>14 Q. Okay. However, as you just said, it turns out</p> <p>15 that 700 University Avenue, from a geocoding</p> <p>16 perspective, actually falls offside -- outside of the</p> <p>17 campus border, correct?</p> <p>18 A. It does.</p> <p>19 Q. And that actually maps to a location that's</p> <p>20 south of here in the City of Prairie View.</p> <p>21 A. I believe so. I can't say necessarily my</p> <p>22 knowledge of direction, where it is.</p> <p>23 Q. Okay. So the problem with the addressing, just</p> <p>24 so we're clear for the record, was that if you were a</p> <p>25 student who registered using that 700 University Avenue</p>	<p style="text-align: right;">Page 55</p> <p>1 surrounding the addressing issue that you're aware of?</p> <p>2 A. No.</p> <p>3 Q. Are you aware of -- scratch that.</p> <p>4 You also mentioned a registration being</p> <p>5 valid.</p> <p>6 A. Yes.</p> <p>7 Q. Are you aware of anyone whose registration was</p> <p>8 deemed invalid or canceled based on this addressing</p> <p>9 issue?</p> <p>10 A. Yes.</p> <p>11 Q. Who is that?</p> <p>12 A. I don't have names to give; but I do know that</p> <p>13 there was students, as a collective, multiple ones,</p> <p>14 whose registration -- when they went to go vote, their</p> <p>15 registration was deemed invalid or they had not</p> <p>16 currently been registered technically due to the</p> <p>17 addresses.</p> <p>18 Q. How did you come to learn that?</p> <p>19 A. Talking to different students, meetings. It</p> <p>20 wasn't necessarily a specific meeting that was held</p> <p>21 because of it. It was just conversation amongst the</p> <p>22 students.</p> <p>23 Q. Okay. Other than talking secondhand to</p> <p>24 students, any basis to conclude or do you have any other</p> <p>25 reason to believe that any registrations were canceled</p>
<p style="text-align: right;">Page 54</p> <p>1 address --</p> <p>2 A. Uh-huh.</p> <p>3 Q. I'm sorry. University Drive. I think I said</p> <p>4 University Avenue a couple of times.</p> <p>5 A. I understood.</p> <p>6 Q. 700 University Drive.</p> <p>7 Then, on a map, that would actually place</p> <p>8 you off campus in the City of Prairie View, correct?</p> <p>9 A. That is correct.</p> <p>10 Q. And therefore in Precinct 310, not Precinct</p> <p>11 309.</p> <p>12 A. That is correct.</p> <p>13 Q. And so while that wouldn't interfere with your</p> <p>14 ability to vote early, if a student who was registered</p> <p>15 in Precinct 310 came and tried to vote at the student</p> <p>16 center in 309 on election day --</p> <p>17 A. Uh-huh.</p> <p>18 Q. -- they would have to be told to go to Precinct</p> <p>19 310.</p> <p>20 A. That is correct.</p> <p>21 Q. Okay. And so when we talk about the</p> <p>22 difficulties due to the addressing situation, that's</p> <p>23 what we're talking about, right?</p> <p>24 A. That would be one of them, yes.</p> <p>25 Q. Okay. Are there any other difficulties</p>	<p style="text-align: right;">Page 56</p> <p>1 or deemed invalid?</p> <p>2 A. No.</p> <p>3 Q. And you can't tell me any particular student</p> <p>4 who told you that.</p> <p>5 A. I can't give you any names. No, I cannot.</p> <p>6 Q. And when you say you can't give any names, it's</p> <p>7 because you don't know the names, right?</p> <p>8 A. I can't remember them, no.</p> <p>9 Q. Okay. And so this was in regard to the March</p> <p>10 primary, correct?</p> <p>11 A. That is correct.</p> <p>12 Q. As the Democrat precinct chair for 309, when</p> <p>13 you heard about these addressing issues, did you take</p> <p>14 any steps to try to address them?</p> <p>15 A. I spoke with -- well, yes. I eventually spoke</p> <p>16 with Mr. Jackson. But from my understanding, there was</p> <p>17 nothing necessarily that we really could change besides</p> <p>18 using 100 instead of 700.</p> <p>19 Q. When you say "Mr. Jackson," who are you</p> <p>20 referring to?</p> <p>21 A. Frank Jackson.</p> <p>22 Q. And Frank Jackson, is he related to Marian</p> <p>23 Jackson, the JP?</p> <p>24 A. He is.</p> <p>25 Q. His --</p>

Jayla Allen, et al. vs. Waller County Texas, et al.
 Jayla Jenice Allen - 10/11/2019

<p style="text-align: right;">Page 57</p> <p>1 A. That's his wife.</p> <p>2 Q. Okay. Did you make any effort to communicate</p> <p>3 with anybody at the county around the time of the March</p> <p>4 2018 primary regarding the -- this addressing issue?</p> <p>5 A. No, I personally did not. From my</p> <p>6 understanding, there's already been a conversation --</p> <p>7 there was already conversations that had been started</p> <p>8 over the 100 and 700 University Drive.</p> <p>9 Q. And what was your understanding of those</p> <p>10 conversations?</p> <p>11 A. That -- just a clarification of using 100 and</p> <p>12 700 for the most part, I would say.</p> <p>13 Q. And you understood that there were</p> <p>14 conversations ongoing between whom?</p> <p>15 A. Different student leaders, Mr. Jackson, not</p> <p>16 necessarily with the County, but just in general of the</p> <p>17 problem.</p> <p>18 Q. So did you take a spring break trip in March of</p> <p>19 2018?</p> <p>20 A. I believe I took a trip home.</p> <p>21 Q. You went home to Mesquite for spring break?</p> <p>22 A. I think so, if I remember correctly.</p> <p>23 Q. And at that time did you have a vehicle on</p> <p>24 campus?</p> <p>25 A. I did not.</p>	<p style="text-align: right;">Page 59</p> <p>1 A. I lived with a relative.</p> <p>2 Q. Okay. Was that a paid internship?</p> <p>3 A. It was.</p> <p>4 Q. What did you do as part of that internship?</p> <p>5 A. I interned under the governmental relations</p> <p>6 department, so research, travel to Austin, shadowing,</p> <p>7 communicating with other HBCU's -- for the record,</p> <p>8 historically black colleges and universities -- and</p> <p>9 prepared voter registration drives amongst the student</p> <p>10 body that was here for the summer with summer bridge</p> <p>11 programs, office duties, various things.</p> <p>12 Q. When did you get back to the City of Prairie</p> <p>13 View?</p> <p>14 A. For clarification, are you asking when I moved</p> <p>15 back on campus?</p> <p>16 Q. Yes, unless you were here in another capacity</p> <p>17 before that.</p> <p>18 A. No. I believe I moved in in August. I'm sure</p> <p>19 I moved back in in August.</p> <p>20 Q. And would that have been any particular point</p> <p>21 in August that you can remember?</p> <p>22 A. No.</p> <p>23 Q. Fair to say later in August?</p> <p>24 A. Yes, I would say later, closer to when school</p> <p>25 started.</p>
<p style="text-align: right;">Page 58</p> <p>1 Q. Did you get a ride home from your parents?</p> <p>2 A. Yes, or a sister or cousin or someone maybe.</p> <p>3 Q. Did you ever use any other means of</p> <p>4 transportation to get between Mesquite and Prairie View?</p> <p>5 A. No.</p> <p>6 Q. For example, a bus?</p> <p>7 A. No.</p> <p>8 Q. At the end of the 2018 school year, you say in</p> <p>9 your interrogatories that you moved out of the</p> <p>10 University College. Is that correct?</p> <p>11 A. That is correct.</p> <p>12 Q. And your interrogatories indicate that you</p> <p>13 lived overseas for a study abroad program for the</p> <p>14 summer?</p> <p>15 A. That was for 2019.</p> <p>16 Q. 2019?</p> <p>17 A. Yes.</p> <p>18 Q. What did you do during the summer of 2018?</p> <p>19 A. I interned. I lived in Houston.</p> <p>20 Q. Who did you intern for?</p> <p>21 A. The university.</p> <p>22 Q. Prairie View?</p> <p>23 A. Yes.</p> <p>24 Q. And when you lived in Houston, what type of</p> <p>25 housing were you living in?</p>	<p style="text-align: right;">Page 60</p> <p>1 Q. And your interrogatories say that beginning in</p> <p>2 the fall of 2018 -- or in August of 2018 when you moved</p> <p>3 in, you moved to 502 Anne Preston Street?</p> <p>4 A. That is correct.</p> <p>5 Q. And what housing unit is that?</p> <p>6 A. That is University Square.</p> <p>7 Q. University Square.</p> <p>8 And we are sitting today at the University</p> <p>9 Square clubhouse; is that right?</p> <p>10 A. That is correct.</p> <p>11 Q. All right. So this building is part of the</p> <p>12 housing complex that you live in.</p> <p>13 A. That is correct.</p> <p>14 Q. Did you secure this space for us?</p> <p>15 A. I did.</p> <p>16 Q. Well, thank you for your help in that regard.</p> <p>17 A. Oh, you're welcome.</p> <p>18 Q. You still live at the University Square today?</p> <p>19 A. That is correct.</p> <p>20 Q. And if we look back at our map there, which is</p> <p>21 Exhibit 2, I believe the University Square, for purposes</p> <p>22 of the record, is Building 30 in the legend. Is that</p> <p>23 accurate?</p> <p>24 A. Yes.</p> <p>25 Q. And is it accurately portrayed on the map?</p>

Jayla Allen, et al. vs. Waller County Texas, et al.
 Jayla Jenice Allen - 10/11/2019

<p style="text-align: right;">Page 61</p> <p>1 A. Yes. This is small.</p> <p>2 Q. Now, you say in your interrogatories that you</p> <p>3 did have access to a car, correct?</p> <p>4 A. During what time period?</p> <p>5 Q. Well, I guess you tell me. When did you get a</p> <p>6 car?</p> <p>7 A. Fall of 2018.</p> <p>8 Q. And did you purchase that car yourself?</p> <p>9 A. No.</p> <p>10 Q. How did you come by the car?</p> <p>11 A. My parents.</p> <p>12 Q. Is the vehicle titled and registered in your</p> <p>13 name?</p> <p>14 A. My parents.</p> <p>15 Q. Do you make any payments on the car?</p> <p>16 A. No.</p> <p>17 Q. Are you responsible for paying for gas</p> <p>18 yourself?</p> <p>19 A. Yes.</p> <p>20 Q. Do you receive any support for gasoline for the</p> <p>21 vehicle, a gas credit card, anything like that, from</p> <p>22 your family?</p> <p>23 A. Not on a regular basis, no.</p> <p>24 Q. So your car has been registered at PVAMU since</p> <p>25 the fall of 2018?</p>	<p style="text-align: right;">Page 63</p> <p>1 Q. Did your parents have to pay any of the costs</p> <p>2 for your housing for the 2018 school year?</p> <p>3 A. No.</p> <p>4 Q. Did you continue your meal plan for 2018?</p> <p>5 A. Unfortunately, yes.</p> <p>6 Q. Why is that unfortunate?</p> <p>7 A. It's just it's mandatory if you live on campus</p> <p>8 due to students not having transportation means or the</p> <p>9 ability to go off campus and eat.</p> <p>10 Q. So even if you do have transportation, if you</p> <p>11 live on campus, you're required to have the meal plan.</p> <p>12 A. Yes.</p> <p>13 Q. Is your -- I don't know if I asked you before.</p> <p>14 Is your meal plan covered by your scholarships or</p> <p>15 financial aid?</p> <p>16 A. Yes, you did ask. And it is.</p> <p>17 Q. Okay. Great.</p> <p>18 Although you had the meal plan -- does the</p> <p>19 meal plan cover every meal?</p> <p>20 A. Yes, it can. It varies what -- how many meals</p> <p>21 you eat.</p> <p>22 Q. Do you also prepare any of your own meals in</p> <p>23 your apartment?</p> <p>24 A. I do now.</p> <p>25 Q. Okay. Where do you shop for groceries?</p>
<p style="text-align: right;">Page 62</p> <p>1 A. With our parking management department, yes.</p> <p>2 Q. Have you ever gotten a parking ticket on</p> <p>3 campus?</p> <p>4 A. Yes.</p> <p>5 Q. How many?</p> <p>6 A. A couple. Maybe three, maybe four.</p> <p>7 Q. So at least since the fall of 2018, you've been</p> <p>8 in possession of a vehicle on campus, correct?</p> <p>9 A. That is correct.</p> <p>10 Q. For the 2018 school year, did you have all the</p> <p>11 same scholarships and financial support that we had</p> <p>12 discussed before?</p> <p>13 A. No.</p> <p>14 Q. Okay. How did that change?</p> <p>15 A. Some were just within your first year. Some</p> <p>16 were continuous. And then some were renewable, not all.</p> <p>17 Q. Did you have to pay any of your own tuition for</p> <p>18 the 2018 school year?</p> <p>19 A. No.</p> <p>20 Q. Did you -- did your parents have to pay any of</p> <p>21 your tuition for the 2018 school year?</p> <p>22 A. No.</p> <p>23 Q. Did you have to pay any of the costs of your</p> <p>24 housing for the 2018 school year?</p> <p>25 A. No.</p>	<p style="text-align: right;">Page 64</p> <p>1 A. Various places. In town for the most part, so</p> <p>2 Walmart, Brookshire Brothers, Kroger.</p> <p>3 Q. Where is the Walmart?</p> <p>4 A. It is in Hempstead. The closest one is in</p> <p>5 Hempstead. So is the Brookshire Brothers.</p> <p>6 Q. Okay. And the Kroger? Where is the Kroger?</p> <p>7 A. It's in Fairfield.</p> <p>8 Q. I've heard there's an H-E-B around here. Do</p> <p>9 you ever go to the H-E-B?</p> <p>10 A. I'm not a frequent shopper at H-E-B. I've been</p> <p>11 on separate occasions; but for the most part, I don't</p> <p>12 shop at H-E-B.</p> <p>13 Q. Okay. During the 2018 school year did you ever</p> <p>14 go to any off-campus parties in the City of Prairie</p> <p>15 View?</p> <p>16 A. Not that I remember.</p> <p>17 Q. I've heard that sometimes students will have</p> <p>18 parties in a field around here. Are you familiar with</p> <p>19 those?</p> <p>20 A. I've heard of them, yes. I've heard about</p> <p>21 them.</p> <p>22 Q. Have you been to one?</p> <p>23 A. I think I went to one before.</p> <p>24 Q. How was the turnout at it?</p> <p>25 A. I didn't have to go again.</p>

Jayla Allen, et al. vs. Waller County Texas, et al.
 Jayla Jenice Allen - 10/11/2019

Page 65	Page 67
<p>1 Q. Were there a lot of people there?</p> <p>2 A. I guess there was a good -- I'm pretty sure</p> <p>3 there was a good amount, yeah. Yeah.</p> <p>4 Q. In your opinion, are those parties pretty</p> <p>5 popular with students around here?</p> <p>6 A. For some.</p> <p>7 Q. Okay. I think that -- I haven't met a college</p> <p>8 that didn't like parties yet, so -- do you attend church</p> <p>9 in Prairie View?</p> <p>10 A. I don't. I do attend church, but --</p> <p>11 Q. Not in Prairie View, though?</p> <p>12 A. No.</p> <p>13 Q. That's fine.</p> <p>14 Have you ever been to a Prairie View City</p> <p>15 Council meeting?</p> <p>16 A. Yes.</p> <p>17 Q. Did you go to any Prairie View City Council</p> <p>18 meetings in the 2018-2019 school year?</p> <p>19 A. Yes.</p> <p>20 Q. And how did you get to the city hall?</p> <p>21 A. Either transportation of someone else and, if</p> <p>22 it was in fall of 2018, by my own transportation.</p> <p>23 Q. Have you been to the Panther Hill Apartments?</p> <p>24 A. I have before.</p> <p>25 Q. Do you know the location or the distance from</p>	<p>1 kind of go through and find out when each of these</p> <p>2 classes met. Okay?</p> <p>3 A. Okay. If I can remember all of them.</p> <p>4 Q. The -- well, let me ask you this. If we get to</p> <p>5 one that you can't remember, is there a way that you</p> <p>6 could look that up?</p> <p>7 A. I don't -- I don't know actually for the times.</p> <p>8 That is usually on your account for the semester.</p> <p>9 Q. How did you come by this schedule that's</p> <p>10 Exhibit 4?</p> <p>11 A. A transcript or -- yeah, like a -- like a brief</p> <p>12 transcript of your like previous classes. This is what</p> <p>13 they offer.</p> <p>14 Q. Did you print this from your student account or</p> <p>15 something?</p> <p>16 A. Yes, my student account. I apologize.</p> <p>17 Q. That's all right.</p> <p>18 Okay. Let's -- let's go through it and</p> <p>19 we'll see how we do.</p> <p>20 A. Okay.</p> <p>21 Q. The first class is Elementary Chinese?</p> <p>22 A. Yes.</p> <p>23 Q. And that's a three-hour course?</p> <p>24 A. Yes.</p> <p>25 Q. What days did that course meet on?</p>
Page 66	Page 68
<p>1 the Panther Hill Apartments to the Prairie View city</p> <p>2 hall?</p> <p>3 A. Not in mileage or --</p> <p>4 Q. Are they pretty close to each other?</p> <p>5 A. I wouldn't necessarily say close, no.</p> <p>6 Q. Okay. Have you ever gone from the Panther Hill</p> <p>7 Apartments to city hall?</p> <p>8 A. Not directly.</p> <p>9 Q. Let's talk about your schedule in 2018.</p> <p>10 A. Okay.</p> <p>11 MR. SEAQUIST: I'm going to mark Exhibit</p> <p>12 4.</p> <p>13 (Exhibit No. 4 marked)</p> <p>14 Q. (BY MR. SEAQUIST) Ms. Allen, Exhibit 4 is Bates</p> <p>15 labeled Plaintiffs 148. And I will represent to you</p> <p>16 that this is what was produced to us by the plaintiffs</p> <p>17 and represented to us to be your class schedule for the</p> <p>18 fall of 2018.</p> <p>19 A. That is correct.</p> <p>20 Q. Is -- does this fairly and accurately depict</p> <p>21 the courses that you took in the fall of 2018?</p> <p>22 A. That is correct.</p> <p>23 Q. Okay. So this is helpful in terms of telling</p> <p>24 us what classes you took, but it doesn't actually have</p> <p>25 your schedule on it. So what I'd like to do is just</p>	<p>1 A. If I remember correctly, it was three days a</p> <p>2 week, so I'm pretty sure Monday, Wednesday, and Friday.</p> <p>3 Actually, I'm sure of that.</p> <p>4 Q. And what time of day was that class?</p> <p>5 A. I don't remember necessarily the exact time.</p> <p>6 Maybe the first half of the day.</p> <p>7 Q. A morning class?</p> <p>8 A. Yes.</p> <p>9 Q. Do you remember how long that class lasted?</p> <p>10 A. No.</p> <p>11 Q. If it's a three-hour class that meets three</p> <p>12 times a week, is it fair to assume it was probably about</p> <p>13 an hour long?</p> <p>14 A. Yes.</p> <p>15 Q. The next class is the Honors Colloquium II?</p> <p>16 A. Yes.</p> <p>17 Q. What does that class entail?</p> <p>18 A. It's through honors college here at Prairie</p> <p>19 View -- the program. Excuse me. It was a specific</p> <p>20 class that we took, being in the program, within our</p> <p>21 first semester and more so of like a history class, I</p> <p>22 guess you would say.</p> <p>23 Q. Okay. And also a three-hour class?</p> <p>24 A. Yes.</p> <p>25 Q. Do you remember what days this course met?</p>

Jayla Allen, et al. vs. Waller County Texas, et al.
 Jayla Jenice Allen - 10/11/2019

<p style="text-align: right;">Page 69</p> <p>1 A. Thursdays.</p> <p>2 Q. Would it have been Thursdays only or Tuesdays</p> <p>3 and Thursdays?</p> <p>4 A. Thursdays only.</p> <p>5 Q. And do you remember what time that class met?</p> <p>6 A. Yes. At five o'clock. At five o'clock to</p> <p>7 eight o'clock, sometimes longer.</p> <p>8 Q. Okay. The next class is Introduction to</p> <p>9 Political Science?</p> <p>10 A. Yes.</p> <p>11 Q. A three-hour course?</p> <p>12 A. Yes.</p> <p>13 Q. What days did that course meet?</p> <p>14 A. I don't remember.</p> <p>15 Q. Do you remember whether it was two days a week</p> <p>16 or three days a week?</p> <p>17 A. I don't, no.</p> <p>18 Q. Do you remember roughly what time it met?</p> <p>19 A. I believe the second half of the --</p> <p>20 Q. An afternoon class?</p> <p>21 A. Yes, I think so. I can't say specifically, but</p> <p>22 I believe so.</p> <p>23 Q. The next class is Scope and Methods in</p> <p>24 Political Science?</p> <p>25 A. Yes.</p>	<p style="text-align: right;">Page 71</p> <p>1 Q. When you say "later," what do you mean?</p> <p>2 A. After 2:00, 3:00.</p> <p>3 Q. Who was the professor in that class?</p> <p>4 A. I do not remember.</p> <p>5 Q. Do you have -- do you keep a personal calendar?</p> <p>6 A. I do.</p> <p>7 Q. Would you have kept a personal calendar in the</p> <p>8 fall of 2018?</p> <p>9 A. I would have.</p> <p>10 Q. How do you keep it?</p> <p>11 A. More so in a physical planner, writing in.</p> <p>12 Q. Okay. Do you still have a copy of your</p> <p>13 calendar from 2018 for the fall?</p> <p>14 A. I don't -- I'm not sure actually. It might</p> <p>15 either be back home or in the trash.</p> <p>16 Q. Okay. You haven't looked for it at this point,</p> <p>17 though?</p> <p>18 A. No.</p> <p>19 Q. Do you keep an electronic calendar like in your</p> <p>20 phone or on the computer?</p> <p>21 A. I do now.</p> <p>22 Q. In the fall of 2018 did you do that?</p> <p>23 A. I don't think it was more so of -- I think it</p> <p>24 was more so a physical copy.</p> <p>25 Q. The last class is the Internship in Political</p>
<p style="text-align: right;">Page 70</p> <p>1 Q. A three-hour class.</p> <p>2 A. Yes.</p> <p>3 Q. What days did that meet?</p> <p>4 A. I'm not sure.</p> <p>5 Q. Do you remember who your professor was?</p> <p>6 A. I believe Mitchell, Dr. Mitchell, I believe.</p> <p>7 Q. Let me go back to the one before, which was the</p> <p>8 Introduction to Political Science. Do you remember who</p> <p>9 your professor was in that one?</p> <p>10 A. Yes. Tabitha Morton.</p> <p>11 Q. Okay. So for Professor Mitchell's Scope and</p> <p>12 Methods in Political Science, you don't remember what</p> <p>13 days it met.</p> <p>14 A. No, I do not. Excuse me.</p> <p>15 Q. Do you remember what time of day that course</p> <p>16 was?</p> <p>17 A. I would say midday, maybe afternoon.</p> <p>18 Q. The next class is a Modern Political Theory?</p> <p>19 A. That is correct.</p> <p>20 Q. A three-hour course?</p> <p>21 A. Yes.</p> <p>22 Q. What days did that meet?</p> <p>23 A. I don't remember.</p> <p>24 Q. What time of day was it?</p> <p>25 A. I believe this was a later class.</p>	<p style="text-align: right;">Page 72</p> <p>1 Science.</p> <p>2 A. Yes.</p> <p>3 Q. And that's a six-hour course.</p> <p>4 A. That is correct.</p> <p>5 Q. What did that entail?</p> <p>6 A. Being able to intern during my undergrad, but</p> <p>7 also the course work that came with it, so it was a</p> <p>8 one-on-one class.</p> <p>9 Q. Did this relate to the internship you had done</p> <p>10 in Houston the previous summer?</p> <p>11 A. Yes. It was continuous.</p> <p>12 Q. Okay. So this was an internship that was</p> <p>13 ongoing.</p> <p>14 Were you actually -- in the fall of 2018</p> <p>15 did you actually go and intern anywhere or you were just</p> <p>16 completing course work?</p> <p>17 A. I was -- I was still doing the duties of it,</p> <p>18 but I was no longer being paid for it, so therefore I</p> <p>19 was able to get the credit hours.</p> <p>20 Q. And you said it was one-on-one?</p> <p>21 A. Yes.</p> <p>22 Q. Who did you meet with?</p> <p>23 A. Nojeim.</p> <p>24 THE REPORTER: I'm sorry?</p> <p>25 THE WITNESS: Dr. Nojeim. Nojeim,</p>

Jayla Allen, et al. vs. Waller County Texas, et al.
 Jayla Jenice Allen - 10/11/2019

<p style="text-align: right;">Page 73</p> <p>1 N-o-j-i-e-m. I hope that's correct. I'm pretty sure it 2 is. 3 Q. (BY MR. SEAQUIST) How often would you meet with 4 Dr. Nojeim? 5 A. It varied. I had different assignments that 6 were due. So there were different forms, going to his 7 office, meeting with him, e-mails. 8 Q. So there was no set meeting schedule with 9 Dr. Nojeim. 10 A. No, there was not. 11 Q. In the fall of 2018 do you remember, for your 12 Monday, Wednesday, Friday schedule, roughly what time 13 your classes started? 14 A. Oh, no. Morning, I'm sure. Not the exact 15 time, no. 16 Q. What's the earliest class you've ever had? 17 A. 8:00 a.m. 18 Q. Okay. Do you know whether you had any 8:00 19 a.m. classes in the March of -- or in the fall of 2018? 20 A. If it wasn't 8:00, it was 9:00. 21 Q. And we talked about your Honors Colloquium 22 which went to 8:00. Other than that, what was the 23 latest class you had? 24 A. It was the -- excuse me. It was the Modern 25 Political Theory. I believe that was the latest class</p>	<p style="text-align: right;">Page 75</p> <p>1 to do one on one, any personal or being in different 2 organizations, anything -- any activities or personal 3 responsibilities that I needed to take care of. 4 Q. Do you also have other breaks in your schedule 5 during the day where you're -- well, let's talk back to 6 March of -- I mean, excuse me, the fall of 2018, if you 7 can remember. 8 Were there breaks in your schedule, for 9 example, in the morning when you would have an hour off 10 where you could study or do other personal items if you 11 needed to? 12 A. Yes. 13 Q. And was there typically an afternoon break in 14 your schedule where you could do that? 15 A. I can't say that there was. 16 MS. ADEN: Gunnar, do you mind if we take 17 a quick break now that -- if you're not as focused on 18 this topic? 19 MR. SEAQUIST: Yeah. 20 (Recess from 11:25 a.m. to 11:34 a.m.) 21 Q. (BY MR. SEAQUIST) All right. Ms. Allen, we are 22 back on the record after a break. Is there anything 23 from your testimony before that we need to clear up 24 before we move on? 25 A. No.</p>
<p style="text-align: right;">Page 74</p> <p>1 I've had during that semester. 2 Q. Okay. And that was the one you told me you 3 thought was around 2:00 to 3:00? 4 A. Yes. 5 Q. When you were -- do you generally remember 6 having this schedule? 7 A. Yes. 8 Q. Okay. And do you remember having to 9 transition, for example, from Chinese to your next 10 class? 11 A. No, I do not. 12 Q. Do you remember where -- what building your 13 Chinese class was located in? 14 A. Chinese was located in -- I do not remember. 15 Q. Okay. Do you remember whether you had a lunch 16 break? 17 A. Yes. 18 Q. What's your typical practice for having lunch? 19 A. Going back to my room and eating something 20 there. 21 Q. Okay. And so in the fall of 2018 that was your 22 practice? 23 A. For the most part. Well, I really don't eat 24 lunch. A lot of times I'm in between, so like going 25 back and forth from class to meetings, anything I need</p>	<p style="text-align: right;">Page 76</p> <p>1 Q. Okay. 2 A. Excuse me. 3 Q. I have that, too. 4 In addition to your class schedule, you've 5 identified some other activities in your interrogatories 6 that you were participating in in the fall of 2018. 7 A. Yes. 8 Q. I'd like to talk to you about those now, one of 9 which was the Blackstone Pre-Law Society. 10 A. Yes, that is correct. 11 Q. Can you tell me about that? 12 A. Blackstone is an organization on campus that -- 13 it's centered around pre-law students. It gives us some 14 opportunities to network, make connections, speak with 15 different organizations outside of our campus in 16 different law schools, sometimes traveling to different 17 places, also meetings, fundraisers, stuff like that. 18 Q. Are you -- is there any way to formally declare 19 as a pre-law student? 20 A. No, there is not, not at Prairie View. 21 Q. But it sounds like your plan is to pursue a law 22 degree. 23 A. That is correct. 24 Q. Okay. Was there a regular meeting time for the 25 Blackstone Pre-Law Society?</p>

Jayla Allen, et al. vs. Waller County Texas, et al.
 Jayla Jenice Allen - 10/11/2019

Page 77	Page 79
<p>1 A. Yes. And also, of course, then the different 2 event times and things like that. 3 Q. When did you start participating or join the 4 Blackstone Pre-Law Society? 5 A. I started participating, I believe, in spring 6 of 2018. I didn't start going to like the meetings and 7 participating until fall of 2018 as like a formal 8 member. 9 Q. In the fall of 2018 when were the regular 10 meetings held? 11 A. If I remember correctly, Monday. 12 Q. And what time on Mondays? 13 A. Either 5:00 or 6:00 or 7:00, some -- in the 14 evening time. 15 Q. How long did they last? 16 A. It varied. I didn't attend every meeting if I 17 might have had like work or other meetings or anything 18 else. It was kind of hard to juggle time. 19 Q. Other than the weekly meeting, were there any 20 other time commitments in connection with the Blackstone 21 Pre-Law Society? 22 A. Not outside of their -- their activities or 23 anything else that they had going on. 24 Q. When were their activities typically held? Was 25 that something that they would do on weekends or --</p>	<p>1 meeting for Ignite? 2 A. There was. There was. 3 Q. And when did that take place? Or when was it 4 scheduled in the fall of 2018? 5 A. I can't remember exactly. I would say around 6 midweek. 7 Q. So it was a weekly meeting? 8 A. Or every other week. It depends. But I met 9 with some of the members in the -- the vice-president 10 and the president of the organization regularly. 11 Q. How long were the regular meetings? 12 A. Anywhere from -- I would say roughly around an 13 hour. 14 Q. And when you would meet with the president and 15 vice-president of the organization, were those regularly 16 scheduled meetings or just they varied? 17 A. They varied, when we could. Usually they were 18 weekly, though. 19 Q. And how long would those meetings last? 20 A. It depends. 21 Q. When did you tend to have those meetings? 22 A. When we could. Both the vice-president and 23 president were very active student leaders on campus, so 24 it was kind of like "Can you meet at this time? Can you 25 meet at this time?" And when we could, we could -- we</p>
Page 78	Page 80
<p>1 A. No. More so just on the weekdays, but during 2 the evenings. It just varies, like any other 3 organization, the times. 4 Q. Okay. There wasn't any kind of a -- you didn't 5 have to do any homework or, you know, course preparation 6 type work for that? 7 A. No, I wouldn't say that I did. 8 Q. Did you get any school credit for the 9 Blackstone Pre-Law Society? 10 A. No. 11 Q. It's just an extracurricular activity? 12 A. Yes, that is correct. 13 Q. You also indicated that you are a member of 14 Ignite? 15 A. Yes. 16 Q. Tell me what that is, please. 17 A. Ignite is a national women's political 18 organization. It focuses on preparing young women on 19 college campuses, preparing for them to like take office 20 or to engage like politically on campus. 21 Q. When did you join Ignite? 22 A. Formally I joined Ignite in fall of 2018; but 23 like Blackstone, I participated or was -- well, no. I 24 joined in fall of 2018. 25 Q. And what were -- well, is there a regular</p>	<p>1 would. 2 Q. Was there any course credit for your 3 participation in that program? 4 A. No, there was not. 5 Q. Also just extracurricular? 6 A. Yes, that is correct. 7 Q. You also indicate that you were the chair of 8 the Rock the Vote for the PVAMU Student Government 9 Association. 10 A. That is correct. 11 Q. When did you assume that role? 12 A. Fall of 2018. 13 Q. And tell me about the Rock the Vote program. 14 A. Rock the Vote was a chair in the Student 15 Government Association through the executive branch. So 16 on top of weekly meetings, I met with my advisor and 17 different members of SGA, Student Government 18 Association. And, yeah, that was for the most part. 19 Q. And what was the goal of the Rock the Vote 20 program? 21 A. The Rock the Vote chair, my primary duties were 22 civic engagement, voting on campus, anything that 23 involves it. Basically kind of already doing what I was 24 doing, but bringing that to the Student Government 25 Association.</p>

Jayla Allen, et al. vs. Waller County Texas, et al.
 Jayla Jenice Allen - 10/11/2019

<p style="text-align: right;">Page 81</p> <p>1 Q. Did you conduct outreach to students as well 2 through the Student Government Association? 3 A. That is correct. 4 Q. As part of that, did you, for example, 5 encourage voter registration? 6 A. That is correct. 7 Q. Did you try to provide information on voting 8 opportunities? 9 A. That is correct. 10 Q. Important to make sure students know when the 11 available locations and hours are for voting? 12 A. That is correct. 13 Q. And so that's something that's part of the 14 Student Government Association's mission generally. 15 A. I can't say that it is or that it isn't. I 16 would say, in my position as Rock the Vote chair, that 17 was a part of my personal duties for the organization. 18 Q. Okay. And did you, as part of the Rock the 19 Vote, work towards organizing transportation for 20 students to vote? 21 A. I did that as a collective, so that was with 22 different organizations. That wasn't solely as my -- in 23 my position as Rock the Vote chair. 24 Q. When you say "as a collective," what do you 25 mean?</p>	<p style="text-align: right;">Page 83</p> <p>1 Q. You just don't know one way or the other? 2 A. No. Not -- especially not as an organization. 3 Members of the organization, I'm not sure. 4 Q. Well, let me make sure I understand your 5 answer. You're not sure both as an organization or as 6 members of the organization. 7 A. I'm pretty -- well, I would say that some 8 members of the organization has provided transportation 9 for voting, but I wouldn't -- I don't know if the 10 association -- the government association has -- as a 11 collective, has done that before. 12 Q. Okay. Were there regular meetings that you 13 attended as the chair of the Rock the Vote? 14 A. Yes. 15 Q. When were those held? 16 A. Mondays or Tuesdays. And if there's any 17 additional meetings, they would have been declared some 18 other time during the week. 19 Q. And as the chair of Rock the Vote, did you just 20 participate in the general Student Government 21 Association meetings or were there specific Rock the 22 Vote meetings? 23 A. No. It was the exclusive executive branch 24 meetings within the Student Government Association. 25 Q. Okay. And you said those were Mondays or</p>
<p style="text-align: right;">Page 82</p> <p>1 A. I'm a part of several -- I was a part of 2 several organizations; and so when we -- when we 3 organized transportation, it wasn't solely with the 4 Student Government Association. 5 Q. Okay. But the -- your -- the Student 6 Government Association cooperated in that process. 7 A. I would say I did. 8 Q. You did as part of your role as the Student 9 Government Association. 10 A. Yes. 11 Q. Okay. Prior to the fall of 2018 had the 12 Student Government Association -- had prior chairs of 13 the Rock the Vote commission or -- Rock the Vote 14 program? What's the best way to refer to that? 15 A. Or chair. Rock the Vote chair. 16 Q. Rock the Vote chair. 17 A. Uh-huh. 18 Q. Had prior Rock the Vote chairs worked to assist 19 with providing transportation for Prairie View A&M 20 voters? 21 A. I can't say that they have or they haven't. 22 Q. Do you know if the Student Government 23 Association had previously worked to provide 24 transportation for student voters? 25 A. I can't say that they have or they haven't.</p>	<p style="text-align: right;">Page 84</p> <p>1 Tuesdays? 2 A. That is correct. 3 Q. What time did they meet? 4 A. In the evening. I don't know the exact time. 5 Q. How long did those meetings typically last? 6 A. They could go on. So anywhere from an hour or 7 two to three or so. It just depends what's on our 8 agenda and anything that comes along during the meeting 9 or any special topics. 10 Q. Did you get any credit, course credit, for 11 being a member of the -- or being the chair of the Rock 12 the Vote? 13 A. I did not. 14 Q. Solely an extracurricular activity. 15 A. That is correct. 16 Q. You say you started in that position in the 17 fall of 2018. Are you still the chair of Rock the Vote? 18 A. No, I am not. 19 Q. When did your term in that position end? 20 A. It was a full year, so fall of 2018 to spring 21 of 2019. 22 Q. I guess I should have asked that for the other 23 ones. 24 Are you still a member of the Blackstone 25 Pre-Law Society?</p>

Jayla Allen, et al. vs. Waller County Texas, et al.
 Jayla Jenice Allen - 10/11/2019

Page 85	Page 87
<p>1 A. Not as active, but I am still a member.</p> <p>2 Q. When did you say your participation fell off in</p> <p>3 that?</p> <p>4 A. I would say this semester.</p> <p>5 Q. Are you still a member of Ignite?</p> <p>6 A. Yes.</p> <p>7 Q. And are you still active in Ignite?</p> <p>8 A. Yes, very much so.</p> <p>9 Q. Your interrogatory responses also state that</p> <p>10 you're a member of The Panther Party.</p> <p>11 A. That is correct.</p> <p>12 Q. And generally just tell us what the Prairie</p> <p>13 View Panther Party is.</p> <p>14 A. The Panther Party focuses on community</p> <p>15 engagement, civic engagement, political activity,</p> <p>16 community service, engaging our students with what's</p> <p>17 happening on our campus and within the community of</p> <p>18 Prairie View.</p> <p>19 Q. The panther is the Prairie View mascot. Yes?</p> <p>20 A. That is correct.</p> <p>21 Q. How did you come to learn of The Panther Party?</p> <p>22 A. Joshua Muhammad --</p> <p>23 Q. How did you meet Joshua Muhammad?</p> <p>24 A. -- and Kirsten Budwine.</p> <p>25 Q. Okay. How did you meet Joshua Muhammad?</p>	<p>1 Q. So for the 2017 to 2018 school year, although</p> <p>2 you didn't have a vehicle, your sister did.</p> <p>3 A. Yes.</p> <p>4 Q. Would your sister give you rides if you needed</p> <p>5 them?</p> <p>6 A. At times. She lives off campus, so our</p> <p>7 schedules had many conflicts.</p> <p>8 Q. When did you officially join The Panther Party?</p> <p>9 A. Fall of 2018.</p> <p>10 Q. What were the -- what was the process for</p> <p>11 joining, if you remember?</p> <p>12 A. An application. Very simple.</p> <p>13 Q. Did you have to pay any dues?</p> <p>14 A. I personally did not pay any dues coming in.</p> <p>15 I'm not sure if there were regular like normal dues for</p> <p>16 the members.</p> <p>17 Q. Do you -- did you ever pay any dues to The</p> <p>18 Panther Party?</p> <p>19 A. No.</p> <p>20 Q. Did you ever make any financial donations to</p> <p>21 The Panther Party?</p> <p>22 A. No, not directly.</p> <p>23 Q. Did you hold any kind of a special position in</p> <p>24 The Panther Party?</p> <p>25 A. Not formally.</p>
Page 86	Page 88
<p>1 A. I met Joshua in the summer of 2018. I worked</p> <p>2 alongside with him on various projects.</p> <p>3 Q. Was that as part of your internship?</p> <p>4 A. It was, and outside of it.</p> <p>5 Q. Was Mr. Muhammad also participating in that</p> <p>6 internship?</p> <p>7 A. He was not.</p> <p>8 Q. I didn't ask you. When you went to your</p> <p>9 internship -- or when you lived in Houston for your</p> <p>10 internship in the summer of 2018, did you have your</p> <p>11 vehicle by that point?</p> <p>12 A. I did.</p> <p>13 Q. So if you had to go to Austin, would you have</p> <p>14 driven yourself there?</p> <p>15 A. No.</p> <p>16 Q. How would you have gotten to Austin for events</p> <p>17 for your internship?</p> <p>18 A. I would have rode with someone from the</p> <p>19 university or carpooled.</p> <p>20 Q. During your first year when you didn't have a</p> <p>21 vehicle here, I think you testified your sister, your</p> <p>22 older sister, was already a student here, right?</p> <p>23 A. That's correct.</p> <p>24 Q. Did she have a vehicle on campus?</p> <p>25 A. At that time, yes. She has not always.</p>	<p>1 Q. Informally?</p> <p>2 A. Yes.</p> <p>3 Q. What was that?</p> <p>4 A. I took on like political -- basically like the</p> <p>5 political activity chair. I'm not sure if that's the</p> <p>6 formal name of it. I can't remember. But it was</p> <p>7 informally. It wasn't a formal position designated for</p> <p>8 myself.</p> <p>9 Q. We spoke to Mr. Muhammad as the representative</p> <p>10 of The Panther Party yesterday, and he had mentioned</p> <p>11 that there was a political engagement committee.</p> <p>12 A. Yes.</p> <p>13 Q. And that that political engagement committee</p> <p>14 had a chair.</p> <p>15 A. Yes.</p> <p>16 Q. Were you the chair of the political engagement</p> <p>17 committee?</p> <p>18 A. I would say informally, yes.</p> <p>19 Q. Was there a formal chair?</p> <p>20 A. No, not -- I would believe that it would just</p> <p>21 have been me or someone else. But we all kind of helped</p> <p>22 out in that position with our engagement, so --</p> <p>23 Q. Do you remember how many Panther -- how many</p> <p>24 members The Panther Party had in the fall of 2018?</p> <p>25 A. No, I do not remember.</p>

Jayla Allen, et al. vs. Waller County Texas, et al.
 Jayla Jenice Allen - 10/11/2019

<p style="text-align: right;">Page 89</p> <p>1 Q. It's been suggested to us that there was 2 approximately 20. Does that sound reasonable to you? 3 A. Yes, it does. 4 Q. Do you know, out of that 20, how many had their 5 own vehicles? 6 A. No, I do not. No, I do not. 7 Q. Do you know, out of that 20, how many lived on 8 campus? 9 A. No. 10 Q. Did some live off campus? 11 A. Yes. 12 Q. Your interrogatories say that you committed 13 approximately an hour a week to The Panther Party during 14 the fall 2018 semester. 15 A. Yes, I would say that. 16 Q. What did that hour consist of? 17 A. If it wasn't within a meeting, maybe it was 18 one-on-one meetings or just preparing an activity or my 19 role within the organization. 20 Q. Did The Panther Party in the fall of 2018 have 21 regular meetings? 22 A. Yes. 23 Q. And how often did those meetings occur? 24 A. I can't say that I remember. 25 Q. Do you know whether it was weekly or less</p>	<p style="text-align: right;">Page 91</p> <p>1 with The Panther Party, did you have any involvement 2 with the organization's finances? 3 A. No. 4 Q. Were you responsible for spending Panther Party 5 funds in any way? 6 A. No. 7 Q. Were you responsible for receiving donations in 8 any way? 9 A. No. 10 Q. Did you ever monitor the bank account? 11 A. No. 12 Q. Were you ever at -- my understanding is that 13 The Panther Party had a mailing address that was a 14 P.O. box. Were you aware of that? 15 A. I might have been. I can't necessarily say. 16 Q. Were you ever asked to go pick up the mail from 17 the post office? 18 A. No, I was not. 19 Q. Did you in the general -- in the fall of 20 2018 -- so that's in advance of the general election, 21 November -- did you attend any voter registration 22 drives -- 23 A. Yes. 24 Q. -- hosted by -- I'm sorry. 25 A. I'm sorry.</p>
<p style="text-align: right;">Page 90</p> <p>1 frequently than that? 2 A. It was weekly or every other week. 3 Q. And when The Panther Party met, what time 4 generally did it meet? 5 A. I do not remember. 6 Q. Was it in the evening to your recollection? 7 A. It was in the evening, for the general body 8 meeting, yes. 9 Q. When it comes to political engagement -- so my 10 understanding from some of the materials in this case is 11 that there are kind of three main goals of The Panther 12 Party and they're broken down into community 13 development, economic development, and political 14 engagement. Do I have that right? 15 A. I would say yes. 16 Q. Okay. What activities does the political 17 engagement arm of The Panther Party engage in? 18 A. Reminding that many students who are in this 19 organization are in various organizations, so 20 participating in different activities within like Ignite 21 or the Student Government Association, so hosting voter 22 registration on campus, meetings, voter education, or 23 participating in any type of seminars or conferences 24 surrounding political engagement off campus as well. 25 Q. Okay. Did you -- as part of your participation</p>	<p style="text-align: right;">Page 92</p> <p>1 Q. That's all right. I paused. Let me start 2 over. 3 Did you attend any voter registration 4 drives hosted by The Panther Party? 5 A. I cannot remember if I did or if I did not. 6 Q. Okay. Do you recall specifically any other 7 trainings that were hosted by The Panther Party in 8 advance of the November 2018 election? 9 A. I believe there were some. I did not 10 participate in them. 11 Q. What kind of trainings would The Panther Party 12 typically hold in advance of an election? 13 A. I really can't speak on them, considering that 14 I wasn't a part of them to give details. 15 Q. Okay. Do you know whether there were any get 16 out the votes events hosted by The Panther Party in 17 advance of the November 2018 election? 18 A. I'm not sure. 19 Q. Do you know whether there were any candidate 20 forums hosted by The Panther Party in advance of the 21 2018 election? 22 A. I don't think so. 23 Q. Do you know whether The Panther Party supported 24 any particular candidates in the 2018 November election? 25 A. No.</p>

Jayla Allen, et al. vs. Waller County Texas, et al.
 Jayla Jenice Allen - 10/11/2019

<p style="text-align: right;">Page 93</p> <p>1 Q. Do you know whether -- no, you don't know, or 2 no, it did not? 3 A. No, I don't know; but I don't think they did. 4 Q. Do you know whether it supported any particular 5 political party? 6 A. No, they did not. 7 Q. Do you have -- or do you use social media? 8 A. I do. 9 Q. What social media platforms do you have an 10 account on? 11 A. I have one on Facebook, Twitter, and Snap. But 12 I use my Twitter for more of the political platform here 13 on campus in reaching our students. 14 Q. Did you have access to -- well, first, did The 15 Panther Party have its own social media platforms? 16 A. Yes, it did. 17 Q. And what platforms does it have? 18 A. I know for sure that they have a Twitter and a 19 Facebook account. 20 Q. As a member of The Panther Party, did you have 21 access to its social media platforms? 22 A. No. 23 Q. So you never made any posts through the formal 24 Panther Party accounts. 25 A. No, I did not.</p>	<p style="text-align: right;">Page 95</p> <p>1 platforms the County has available for disseminating 2 information? 3 A. I believe I not necessarily have looked for one 4 but might have come across one. 5 Q. So are you aware that the County has, for 6 example, a Facebook account? 7 A. No. 8 Q. Are you aware that the County has a Twitter 9 account or page? 10 A. Actually, I am aware that they have a Facebook 11 account. 12 Q. But you don't know whether you follow it or 13 not. 14 A. No, I do not. 15 Q. You don't follow it. 16 A. I don't. 17 Q. The same question for Twitter. Are you aware 18 that they have a Twitter page? 19 A. I am not aware. 20 Q. And you're not aware of it or -- 21 A. Or I was not aware. I was not aware. 22 Q. And being that you're not aware of it, I'm 23 going to assume you don't follow it. 24 A. No, I do not. 25 Q. How many Twitter followers do you have?</p>
<p style="text-align: right;">Page 94</p> <p>1 Q. Do you know who did? 2 A. No. I know, of course, Joshua Muhammad had 3 access and maybe Kirsten Budwine. But I'm not sure we 4 did have a social media chair and who else might have 5 had access to those accounts. 6 Q. Who was the social media chair? 7 A. I'm not sure if they had one. 8 Q. So in theory, there was that position, but 9 you're not sure if it was filled or not? 10 A. I know that that position has been in various 11 organizations. They usually have one, especially in 12 this day and age with social media being such a big 13 platform. But I'm not sure if we had one within The 14 Panther Party. 15 Q. Okay. In your social media platforms, do you 16 follow The Panther Party on social media? 17 A. I do. 18 Q. What platforms do you follow The Panther Party 19 on? 20 A. I know for sure I follow them on Twitter. 21 Q. Do you, on your personal social media 22 platforms, follow any of the County's -- Waller County's 23 social media? 24 A. No, I do not. 25 Q. Have you ever looked to see what social media</p>	<p style="text-align: right;">Page 96</p> <p>1 A. I don't know. Less than a thousand. 2 Q. Is it more than a few hundred? 3 A. I would say it's a few hundred. 4 Q. Okay. In your role as the precinct chair for 5 309, did other students follow you to get election 6 information? 7 A. Yes. 8 Q. And in your role as the chair of Rock the Vote, 9 did other students follow you to get information about 10 elections? 11 A. Yes. 12 Q. Is it fair to say that in both of those roles 13 you used your social media accounts to disseminate 14 election and voter information? 15 A. On Twitter I did. 16 Q. Did you use your Twitter account to encourage 17 voter registration? 18 A. Yes. 19 Q. Did you use your Twitter account to 20 encourage -- or to get out the vote? 21 A. Yes. 22 Q. All right. Now, in the 2018 general 23 election -- so we're talking about the fall of 2018. 24 A. Yes. 25 Q. You were still in your term as the Precinct 309</p>

Jayla Allen, et al. vs. Waller County Texas, et al.
 Jayla Jenice Allen - 10/11/2019

<p style="text-align: right;">Page 97</p> <p>1 chair?</p> <p>2 A. Yes, that is correct.</p> <p>3 Q. And you continued to serve on the Democratic</p> <p>4 executive committee for Waller County?</p> <p>5 A. Yes, that is correct.</p> <p>6 Q. Did the executive committee meet in the fall of</p> <p>7 2018 leading up to the November election?</p> <p>8 A. I'm sure they did.</p> <p>9 Q. Did the executive committee meet over the</p> <p>10 summer of 2018?</p> <p>11 A. They did.</p> <p>12 Q. Now, you had a vehicle in the summer of 2018.</p> <p>13 Did you come back to attend any meetings of the</p> <p>14 executive committee?</p> <p>15 A. I attended one.</p> <p>16 Q. And when was that? Do you remember?</p> <p>17 A. No, I do not.</p> <p>18 Q. And what was addressed at that meeting?</p> <p>19 A. I cannot remember.</p> <p>20 Q. Do you remember whether at the meeting you came</p> <p>21 back for over the summer of 2018 there was any</p> <p>22 discussion of the upcoming November election?</p> <p>23 A. There was not.</p> <p>24 Q. How -- how often -- I think you told us</p> <p>25 earlier, but remind me. How often did the Democratic</p>	<p style="text-align: right;">Page 99</p> <p>1 Q. Okay. Did you come from Houston to go to the</p> <p>2 meeting?</p> <p>3 A. No. I -- as I mentioned earlier, I was</p> <p>4 interning for the university, so I left after I would</p> <p>5 leave work, after my internship.</p> <p>6 Q. Okay. So while you were interning at the</p> <p>7 university over the summer, you were living in Houston.</p> <p>8 A. That is correct.</p> <p>9 Q. Okay. So your internship was not in Houston.</p> <p>10 It was actually on the premises of the university.</p> <p>11 A. Yes.</p> <p>12 Q. So you were actually working in Prairie View</p> <p>13 throughout the whole summer.</p> <p>14 A. Yes.</p> <p>15 Q. And that's the summer of 2018.</p> <p>16 A. That is correct.</p> <p>17 Q. Okay. Thank you. I understand that better</p> <p>18 now.</p> <p>19 Do you remember going to any executive</p> <p>20 committee meetings of the Waller County Democratic party</p> <p>21 in September of 2018 after school started back up?</p> <p>22 A. No, I do not.</p> <p>23 Q. Is it your belief that you did not attend any</p> <p>24 meetings in September?</p> <p>25 A. That is correct.</p>
<p style="text-align: right;">Page 98</p> <p>1 executive committee meet?</p> <p>2 A. Once or twice a month. I'm not sure. I didn't</p> <p>3 attend a lot of the meetings.</p> <p>4 Q. In September -- well, let's say in August of</p> <p>5 2018 do you recall attending any executive committee</p> <p>6 meetings for the Democratic party of Waller County?</p> <p>7 A. I don't remember. I know I attended one in the</p> <p>8 summer; so therefore, I'm not sure if that summer one</p> <p>9 was in like June, July, or August.</p> <p>10 Q. Can you place it in context? For example, do</p> <p>11 you remember where you came from to go to the meeting?</p> <p>12 A. Campus.</p> <p>13 Q. Okay. So you were already on campus at the</p> <p>14 time of that meeting?</p> <p>15 A. Yes, but the meeting was off campus.</p> <p>16 Q. Understood.</p> <p>17 But if you were on campus, it seems to me</p> <p>18 that the meeting would have either had to have been at</p> <p>19 the end of the spring of 2018 or the very beginning of</p> <p>20 the fall of '18. Is that right?</p> <p>21 A. No. That was a meeting within the summer.</p> <p>22 Q. So I guess my question is: You told us earlier</p> <p>23 in the summer of '18 you were living in Houston as part</p> <p>24 of the internship.</p> <p>25 A. I was.</p>	<p style="text-align: right;">Page 100</p> <p>1 Q. What about in October?</p> <p>2 A. No, I did not.</p> <p>3 Q. What about in November?</p> <p>4 A. Formally, I did not attend a meeting. I did</p> <p>5 have -- we did have -- we hosted meetings where some of</p> <p>6 the members came over and sat in within our meetings</p> <p>7 here on campus.</p> <p>8 Q. And when in November was that? Was that before</p> <p>9 the election or after?</p> <p>10 A. That was actually before the election, so maybe</p> <p>11 end of October and going into November. It was actually</p> <p>12 October, to be exact, the end of October.</p> <p>13 Q. Okay. And you said "we hosted". Who hosted</p> <p>14 the meeting?</p> <p>15 A. Various student leaders. There was no official</p> <p>16 title or organization that hosted the meeting.</p> <p>17 Q. Okay. Where was the meeting held?</p> <p>18 A. Senate chambers in the Student Memorial Center.</p> <p>19 Q. And who came from the Democratic executive</p> <p>20 committee?</p> <p>21 A. Various members. Denise Mattox, to be exact,</p> <p>22 and other members whose names I cannot remember.</p> <p>23 Q. Was Rosa Harris there?</p> <p>24 A. No, she was not.</p> <p>25 Q. And what was the broader purpose of this</p>

Jayla Allen, et al. vs. Waller County Texas, et al.
 Jayla Jenice Allen - 10/11/2019

<p style="text-align: right;">Page 101</p> <p>1 meeting?</p> <p>2 A. Getting basically what we were going to be able</p> <p>3 to -- what we were trying to do to get students after</p> <p>4 the Commissioners Court, so what we were going to be</p> <p>5 able to do in getting students to vote off campus since</p> <p>6 we didn't have early voting or all the days of early</p> <p>7 voting.</p> <p>8 Q. So it's your recollection that this meeting</p> <p>9 would have taken place after the October 17th</p> <p>10 Commissioners Court meeting?</p> <p>11 A. Yes. It was the same day.</p> <p>12 Q. So that evening?</p> <p>13 A. More so that afternoon.</p> <p>14 Q. So this was not a formal meeting of the</p> <p>15 Democratic executive committee.</p> <p>16 A. No, it was not.</p> <p>17 Q. This was a student meeting where -- of various</p> <p>18 student groups where some members of the Democratic</p> <p>19 executive committee were present.</p> <p>20 A. I wouldn't say that it was a student meeting</p> <p>21 because there were -- there were students present.</p> <p>22 There were members of the committee and the club that</p> <p>23 were there as well. And different administrators were</p> <p>24 there as well. So it was a collective group.</p> <p>25 Q. Okay. When you say "the club," you mean the</p>	<p style="text-align: right;">Page 103</p> <p>1 so therefore we decided that we were going to meet to</p> <p>2 discuss things moving forward.</p> <p>3 Q. And so was the plan to have this meeting kind</p> <p>4 of formed in the hallway at the county courthouse or did</p> <p>5 you hear about it another way?</p> <p>6 A. I would say -- I can't say, actually, because</p> <p>7 there was multiple conversations over the phone and I</p> <p>8 guess at the county courthouse.</p> <p>9 Q. Okay. Can you tell me roughly how many people</p> <p>10 attended the meeting total?</p> <p>11 A. A full table, so I would say at least 15 to 18,</p> <p>12 maybe even 20.</p> <p>13 Q. And the discussion or the subject of the</p> <p>14 meeting was how to arrange transportation for voting the</p> <p>15 first week of early voting?</p> <p>16 A. I wouldn't say directly that was the center of</p> <p>17 the conversation. We talked about the county executive</p> <p>18 and club and Rosa Harris' failure to communicate with us</p> <p>19 the days, also moving forward what we were going to be</p> <p>20 able to do, and the position that we were now being put</p> <p>21 in to communicate with our students on campus the voting</p> <p>22 days that we -- well, in the community.</p> <p>23 Q. Okay. So other than that meeting in</p> <p>24 November -- or excuse me, in late October -- well, I</p> <p>25 guess October 17th was the day it took place. Is that</p>
<p style="text-align: right;">Page 102</p> <p>1 Democratic -- the Waller County Democratic Club?</p> <p>2 A. That is correct.</p> <p>3 Q. So there were members of the Waller County</p> <p>4 Democratic Club there.</p> <p>5 A. That is correct.</p> <p>6 Q. You said there were some employee -- or some</p> <p>7 university employees there?</p> <p>8 A. Yes, that is correct.</p> <p>9 Q. And who -- which university employees do you</p> <p>10 remember being there?</p> <p>11 A. There were multiple, but specifically I</p> <p>12 remember Ms. Lowe and Mr. Jackson, Frank Jackson.</p> <p>13 Q. Other than Denise Mattox, who do you remember</p> <p>14 from the Waller County Democratic Club that were there?</p> <p>15 A. I do not remember their names. I know there</p> <p>16 were multiple people who were also there.</p> <p>17 Q. Do you remember who called the meeting?</p> <p>18 A. It was a collective more so of. Yeah. So --</p> <p>19 Q. Was this meeting planned before the October</p> <p>20 17th Commissioners Court meeting?</p> <p>21 A. No, it was not.</p> <p>22 Q. How did the meeting come together as you</p> <p>23 recall?</p> <p>24 A. Basically getting the -- the ruling of the</p> <p>25 Commissioners Court and not getting the additional days,</p>	<p style="text-align: right;">Page 104</p> <p>1 right?</p> <p>2 A. That is correct.</p> <p>3 Q. Other than that meeting, in the fall of 2018,</p> <p>4 you did not attend any of the Democratic executive</p> <p>5 committee meetings.</p> <p>6 A. No, I did not.</p> <p>7 Q. In the fall of 2018 -- I guess over the summer</p> <p>8 when you were here in your internship --</p> <p>9 A. Yes.</p> <p>10 Q. -- going through the election of 2018 --</p> <p>11 A. Yes.</p> <p>12 Q. -- did you have any one-on-one discussions with</p> <p>13 Rosa Harris?</p> <p>14 A. Yes. We spoke at different times. I can't</p> <p>15 necessarily say what date, what time, or what it was</p> <p>16 over. But for the most part they were like general</p> <p>17 conversations.</p> <p>18 Q. So you were in communication with her, but you</p> <p>19 don't recall specifically kind of what the subjects of</p> <p>20 those discussions were.</p> <p>21 A. Yes. I can say that they were very brief,</p> <p>22 general conversations, nothing in a specific matter.</p> <p>23 Q. When you would communicate with Rosa Harris,</p> <p>24 how did you do that?</p> <p>25 A. It could be either text message or not directly</p>

Jayla Allen, et al. vs. Waller County Texas, et al.
 Jayla Jenice Allen - 10/11/2019

Page 105	Page 107
<p>1 but like a call-in from the -- from the line that they</p> <p>2 have, which is like a -- like a general -- Denise</p> <p>3 usually does them. They call out and have like a</p> <p>4 general list of topics that they talk about.</p> <p>5 Q. So they would have like a conference call where</p> <p>6 everyone could call in on it?</p> <p>7 A. Well, you wouldn't call in on it. Well, yes, I</p> <p>8 believe so.</p> <p>9 Q. You said earlier text messages. Did you have</p> <p>10 Rosa Harris' cell phone number?</p> <p>11 A. I did.</p> <p>12 Q. And you recall having at least some text</p> <p>13 messages with her.</p> <p>14 A. Yes.</p> <p>15 Q. Did you have Denise Mattox's cell phone number?</p> <p>16 A. I can't say that I did or that I didn't.</p> <p>17 Q. Can you say whether you recall having any text</p> <p>18 messages with her?</p> <p>19 A. In a general body group message, not a personal</p> <p>20 message.</p> <p>21 Q. So there was a group text for members of the</p> <p>22 executive committee?</p> <p>23 A. Yes. It -- it wasn't necessarily one -- just</p> <p>24 one group message. If there was something to go out</p> <p>25 that one of the members had, then they would send it</p>	<p>1 calls with Rosa Harris, any other communications that</p> <p>2 you had with her about the election, let's say, before</p> <p>3 the October 17th meeting?</p> <p>4 A. No.</p> <p>5 Q. What about Denise Mattox? Did you ever talk to</p> <p>6 her about the election before the October 17th meeting?</p> <p>7 A. No.</p> <p>8 Q. And that includes text messages, e-mails?</p> <p>9 A. That is correct.</p> <p>10 Q. Did you support any particular candidates in</p> <p>11 the 2018 election?</p> <p>12 A. I can't say that I did or that I did not.</p> <p>13 Q. Did you campaign for any candidates in the 2018</p> <p>14 election?</p> <p>15 A. No.</p> <p>16 Q. Did you participate in any voter registration</p> <p>17 drives leading up to the 2018 election?</p> <p>18 A. I did.</p> <p>19 Q. And what do you recall about that?</p> <p>20 A. Just various different voter registration</p> <p>21 drives, some as precinct chair, some within SGA, some</p> <p>22 with just multiple or various deputized students.</p> <p>23 Q. Did you participate in any informational</p> <p>24 sessions about the election educating --</p> <p>25 A. Not that I can -- I can't say that I did or I</p>
Page 106	Page 108
<p>1 out.</p> <p>2 Q. Do you still have any of your text messages</p> <p>3 with Rosa Harris?</p> <p>4 A. No. My phone was stolen in November.</p> <p>5 Q. Oh, man.</p> <p>6 A. Yeah.</p> <p>7 Q. Where did that happen?</p> <p>8 A. The grocery store, the night -- the eve of</p> <p>9 Thanksgiving.</p> <p>10 Q. Well, that's no fun.</p> <p>11 A. At all.</p> <p>12 Q. Okay. Did you communicate with Rosa Harris at</p> <p>13 all by e-mail?</p> <p>14 A. Not a back-and-forth response. Maybe if she</p> <p>15 sent something out or sent out a collective message or</p> <p>16 e-mail through -- for the club or committee.</p> <p>17 Q. When you got e-mails for the club or the</p> <p>18 committee, did those come to your student address or a</p> <p>19 personal e-mail address?</p> <p>20 A. I believe my personal, but there wasn't very</p> <p>21 many e-mails, if any at all.</p> <p>22 Q. Have you looked to see what e-mails you might</p> <p>23 have in relation to the committee or the club?</p> <p>24 A. No, I have not.</p> <p>25 Q. Other than the text messages and some brief</p>	<p>1 did not.</p> <p>2 Q. Okay. And I think I asked you, but -- well,</p> <p>3 scratch that.</p> <p>4 Did you do any get out the vote</p> <p>5 activities?</p> <p>6 A. Yes.</p> <p>7 Q. And what do you remember about that?</p> <p>8 A. I'm not -- I can't remember the specific</p> <p>9 events, but I know I did participate in it and that I</p> <p>10 was aware of the -- of activities of it.</p> <p>11 Q. When I say "get out the vote activity," what</p> <p>12 does that mean in your mind?</p> <p>13 A. It was almost -- I wouldn't necessarily say it</p> <p>14 was a campaign, but it was different activities that we</p> <p>15 did with getting out the actual vote. I know we had</p> <p>16 specific events that were titled or were centered around</p> <p>17 getting out the vote. I know we had it on a couple of</p> <p>18 posters and online.</p> <p>19 Q. In your experience, are those types of</p> <p>20 activities things that happen on the Prairie View campus</p> <p>21 in advance of every election?</p> <p>22 A. I can't say every election. I just remember</p> <p>23 specifically me participating in those events in the</p> <p>24 fall of 2018.</p> <p>25 Q. Okay. You also participated in similar events</p>

Jayla Allen, et al. vs. Waller County Texas, et al.
 Jayla Jenice Allen - 10/11/2019

Page 109	Page 111
<p>1 in advance of the primary in 2018?</p> <p>2 A. Yes.</p> <p>3 Q. You also, I think, testified earlier that you</p> <p>4 participated in similar events in advance of the jail</p> <p>5 bond election in 2017.</p> <p>6 A. I don't remember if I did testify that. I --</p> <p>7 well, actually, you're right. I did. I apologize.</p> <p>8 Q. Okay. So for you, it is important in advance</p> <p>9 of every election to try to encourage your fellow</p> <p>10 students to register.</p> <p>11 A. Most definitely.</p> <p>12 Q. And to try to encourage them to get out to</p> <p>13 vote?</p> <p>14 A. That is correct.</p> <p>15 Q. And to try to make sure they understand when</p> <p>16 the opportunities for them to vote are scheduled.</p> <p>17 A. Yes.</p> <p>18 Q. Okay. And that's true regardless of what the</p> <p>19 particular hours or days of voting are, right?</p> <p>20 A. That is true.</p> <p>21 Q. Okay. Do you think that that sentiment --</p> <p>22 well, in your experience in working with other students</p> <p>23 on campus, do you think they share that belief, that</p> <p>24 it's important to encourage those activities in advance</p> <p>25 of elections here on campus?</p>	<p>1 Q. Okay. And you don't have any reason today to</p> <p>2 believe that that was not the case.</p> <p>3 A. No.</p> <p>4 Q. By the November '18 election, there had been</p> <p>5 two previous elections at Prairie View since you had</p> <p>6 come to school; is that right?</p> <p>7 A. Yes.</p> <p>8 Q. That had been the November 2017 election.</p> <p>9 A. Yes.</p> <p>10 Q. And the March primary in 2018.</p> <p>11 A. Yes.</p> <p>12 Q. Okay. From those elections, you knew that</p> <p>13 there was a schedule for voting and locations that would</p> <p>14 come out prior to the election.</p> <p>15 A. Yes.</p> <p>16 Q. With that knowledge, did you take any actions</p> <p>17 in either the summer or the early fall of 2018 to try to</p> <p>18 figure out what the early voting hours would be for the</p> <p>19 November election?</p> <p>20 A. No, I did not. They were told to me.</p> <p>21 Q. When were they told to you?</p> <p>22 A. I do not remember exactly.</p> <p>23 Q. Do you remember who told them to you?</p> <p>24 A. No, I do not.</p> <p>25 Q. Have you ever gone to the Waller County</p>
Page 110	Page 112
<p>1 A. Yes.</p> <p>2 Q. As the chair of the precinct -- as the</p> <p>3 Democratic chair of Precinct 309, were you aware of the</p> <p>4 process that Waller County uses to set early voting</p> <p>5 hours and locations?</p> <p>6 A. Not at that time, no.</p> <p>7 Q. Have you since come to learn of that process?</p> <p>8 A. Yes.</p> <p>9 Q. And do you understand that process to be that</p> <p>10 the elections administrator prepares a draft schedule</p> <p>11 and submits it to the party chairs for review and</p> <p>12 agreement?</p> <p>13 A. Yes.</p> <p>14 Q. And in this case, the party chair for the</p> <p>15 Republican party was David Luther?</p> <p>16 A. Yes.</p> <p>17 Q. Have you met Mr. Luther?</p> <p>18 A. I have not.</p> <p>19 Q. The party chair for the Democratic party was</p> <p>20 Rosa Harris?</p> <p>21 A. Yes.</p> <p>22 Q. And is it your understanding that both party</p> <p>23 chairs agreed to the draft that was proposed by</p> <p>24 Ms. Eason?</p> <p>25 A. I was later made aware.</p>	<p>1 Commissioners Court website?</p> <p>2 A. I can't say that I have or that I haven't.</p> <p>3 Q. Are you generally aware that Waller County</p> <p>4 posts notice of the Commissioners Court meeting that</p> <p>5 it's going to hold?</p> <p>6 A. Yes. I was later made aware of that. I can't</p> <p>7 say exactly when I found that out.</p> <p>8 Q. And you can't tell me exactly when you learned</p> <p>9 of the early voting -- the initial early voting schedule</p> <p>10 for November of 2018?</p> <p>11 A. Actually, I can. It was when I was first made</p> <p>12 aware that we didn't have the day -- the exact days, so</p> <p>13 a couple of weeks before, a week before.</p> <p>14 Q. A couple of weeks before the October 17th</p> <p>15 meeting?</p> <p>16 A. Before the -- yeah, before Commissioners Court.</p> <p>17 Q. Okay.</p> <p>18 A. Maybe a week before.</p> <p>19 Q. And -- but you don't specifically remember how</p> <p>20 you first saw that, the hours.</p> <p>21 A. It was different from seeing the hours on the</p> <p>22 schedule and then being notified that we didn't have the</p> <p>23 same amount of hours as the rest of the county.</p> <p>24 Q. Okay. When did you first see the hours on a</p> <p>25 schedule?</p>

Jayla Allen, et al. vs. Waller County Texas, et al.
 Jayla Jenice Allen - 10/11/2019

<p style="text-align: right;">Page 113</p> <p>1 A. I can't say specifically.</p> <p>2 Q. Do you remember what format or publication you</p> <p>3 saw that in?</p> <p>4 A. No.</p> <p>5 Q. When did you first learn -- well, so was it two</p> <p>6 weeks before the October 17th meeting when you first</p> <p>7 learned that the hours in Prairie View were not the same</p> <p>8 as other areas?</p> <p>9 A. I believe -- I would say it was a week.</p> <p>10 Q. A week.</p> <p>11 A. A week.</p> <p>12 Q. And how did you come to that knowledge?</p> <p>13 A. A group message that was sent out from Judge</p> <p>14 Jackson.</p> <p>15 Q. And what did that group message say?</p> <p>16 A. It was asking us if we were aware that we had</p> <p>17 been given less days than the rest of the county.</p> <p>18 Q. When you first saw the schedule, before you</p> <p>19 knew the context, the broader context --</p> <p>20 A. It was all around the same time. If not after</p> <p>21 looking at the schedule, after finding out the days</p> <p>22 were -- the specific days.</p> <p>23 Q. Okay. So if I understood you correctly</p> <p>24 earlier, I think what you said was a little different,</p> <p>25 so I just want to make sure --</p>	<p style="text-align: right;">Page 115</p> <p>1 A. The schedule or the actual dates or something</p> <p>2 like that.</p> <p>3 Q. And in doing that, would you have written out</p> <p>4 your own message or would you have shared the schedule</p> <p>5 that was posted by the County?</p> <p>6 A. Either one or both. I can't say I necessarily</p> <p>7 remember.</p> <p>8 Q. You had said there was a group message from</p> <p>9 Judge Jackson.</p> <p>10 A. Uh-huh.</p> <p>11 Q. What -- who else was a part of that group</p> <p>12 message?</p> <p>13 A. Different -- Rosa Harris, Denise Mattox, and</p> <p>14 other members of the club and the committee or within</p> <p>15 the county. A lot of the numbers -- most of the numbers</p> <p>16 I didn't have.</p> <p>17 Q. What was the medium, I guess, for lack of a</p> <p>18 better word, that that group message came through?</p> <p>19 A. I'm sorry?</p> <p>20 Q. Yeah, bad way to ask that.</p> <p>21 Was the group message a text?</p> <p>22 A. Yes, it was a text message.</p> <p>23 Q. A group text.</p> <p>24 And Rosa Harris, Denise Mattox. You said</p> <p>25 other members of the Waller Democratic County Club?</p>
<p style="text-align: right;">Page 114</p> <p>1 A. Okay.</p> <p>2 Q. -- I'm understanding you correctly because when</p> <p>3 you first were testifying about this, I understood you</p> <p>4 to say that you had initially seen the schedule and then</p> <p>5 later came to find out that there was some difference in</p> <p>6 the hours between Prairie View and other areas in Waller</p> <p>7 County.</p> <p>8 A. To clarify, I don't remember exactly when I saw</p> <p>9 that schedule.</p> <p>10 Q. Okay. Do you remember, upon first laying eyes</p> <p>11 on the schedule for early voting in Prairie View,</p> <p>12 whether you had any immediate concerns?</p> <p>13 A. I could not say that I -- no, I can't say that</p> <p>14 I did or that I did not, honestly.</p> <p>15 Q. So you don't remember any specific.</p> <p>16 A. No.</p> <p>17 Q. When you first received the schedule for early</p> <p>18 voting, did you share that in any way?</p> <p>19 A. On social media.</p> <p>20 Q. Okay. Did you notify the Student Government</p> <p>21 Association?</p> <p>22 A. Not necessarily directly.</p> <p>23 Q. Okay. Did you -- I guess other than sharing it</p> <p>24 in social -- what specifically would you have shared in</p> <p>25 social media?</p>	<p style="text-align: right;">Page 116</p> <p>1 A. I believe so.</p> <p>2 Q. Were there other students on it?</p> <p>3 A. I can't remember. I don't -- I'm not sure.</p> <p>4 Q. Were there other student groups on it?</p> <p>5 A. I don't think so.</p> <p>6 Q. So this was a message, to your recollection,</p> <p>7 that you received in your role as the precinct chair</p> <p>8 more than as a student.</p> <p>9 A. I believe so, yes.</p> <p>10 Q. All right. When you got the message from Judge</p> <p>11 Jackson, what -- what did you do in response?</p> <p>12 A. I spoke -- I believe I sent out my personal</p> <p>13 message to other student leaders, asking if they knew</p> <p>14 about it, if it was true, if they've heard anything</p> <p>15 about it, and then, of course, now having clarification</p> <p>16 that it was true, what we could do, what are our next</p> <p>17 steps, what is there to be done.</p> <p>18 Q. Okay. What were your specific concerns about</p> <p>19 the early voting schedule initially adopted by the</p> <p>20 County?</p> <p>21 A. I mean, I guess my original and only was why we</p> <p>22 didn't have the same amount of days and if we can get</p> <p>23 the same amount of days and why it changed.</p> <p>24 Q. Why it changed from what?</p> <p>25 A. From before.</p>

Jayla Allen, et al. vs. Waller County Texas, et al.
 Jayla Jenice Allen - 10/11/2019

Page 117	Page 119
<p>1 Also, I would say the students being</p> <p>2 within the City of Prairie View and not being notified</p> <p>3 of this before, also me being precinct chair and not</p> <p>4 being notified of it before.</p> <p>5 Q. So Ms. Harris never notified you of what the</p> <p>6 proposed schedule would be?</p> <p>7 A. No.</p> <p>8 Q. Do you know whether the proposed schedule was</p> <p>9 ever discussed at any of the Democratic executive</p> <p>10 committee meetings in September?</p> <p>11 A. From my understanding, it was not ever</p> <p>12 discussed in a meeting.</p> <p>13 Q. Okay. Do you know that for sure?</p> <p>14 A. I'm almost positive.</p> <p>15 Q. What's the basis for that understanding?</p> <p>16 A. Speaking in the meeting after Commissioners</p> <p>17 Court.</p> <p>18 Q. And who did you speak to in the meeting after</p> <p>19 Commissioners Court?</p> <p>20 A. Those who were present. So Denise Mattox, of</p> <p>21 course, was present, and the other members who I do not</p> <p>22 know their names.</p> <p>23 Q. Is Frank Jackson on the Democratic executive</p> <p>24 committee?</p> <p>25 A. Not to my knowledge, but I can't say that he is</p>	<p>1 time to vote within the first or second week.</p> <p>2 Q. Okay. So you're saying that, you know,</p> <p>3 additional time, but my question is a little different</p> <p>4 than that, which is: Is there anything about a day of</p> <p>5 voting on the first week versus a day of voting on the</p> <p>6 second week that distinguishes the two?</p> <p>7 A. No, I wouldn't.</p> <p>8 Q. Okay. Once you learned -- once you received</p> <p>9 Judge Mattox's text --</p> <p>10 A. It was Judge Jackson, to clarify.</p> <p>11 Q. I apologize. Judge Jackson. I'm sorry.</p> <p>12 A. Okay.</p> <p>13 Q. Did you make any efforts to contact Christy</p> <p>14 Eason, the Waller County election administrator?</p> <p>15 A. No, I did not.</p> <p>16 Q. Did you speak to Ms. Eason at all during the</p> <p>17 fall of 2018 other than at the Commissioners Court</p> <p>18 meeting?</p> <p>19 A. No, I did not. No, I did not.</p> <p>20 Q. After receiving Judge Jackson's text, did you</p> <p>21 make any effort to contact Trey Duhon, the county judge?</p> <p>22 A. No.</p> <p>23 Q. Do you know who Jeron Barnett is?</p> <p>24 A. I do.</p> <p>25 Q. Who is he?</p>
Page 118	Page 120
<p>1 or that he isn't.</p> <p>2 Q. Was he on the group text from Judge Jackson?</p> <p>3 A. I don't think so. I don't remember seeing his</p> <p>4 name.</p> <p>5 Q. At the time of that text, was there any</p> <p>6 follow-up conversation, responses to Judge Jackson's</p> <p>7 text message?</p> <p>8 A. There were responses. I can't say what they</p> <p>9 were. I don't, you know, have the phone with the</p> <p>10 messages anymore, so I wasn't able to refer back.</p> <p>11 Q. Okay. And you don't remember specifically what</p> <p>12 all was said?</p> <p>13 A. No, I do not.</p> <p>14 Q. So your concern was that the days and hours</p> <p>15 were not the same as other parts of the county; is that</p> <p>16 right?</p> <p>17 A. That is correct.</p> <p>18 Q. Did you know that Prairie View actually got</p> <p>19 more days and hours than some other areas in the county?</p> <p>20 A. That is correct. Well, I later found out.</p> <p>21 Q. Okay. Is it your contention that voting --</p> <p>22 early voting the first week is somehow more effective or</p> <p>23 advantageous than early voting the second week?</p> <p>24 A. I would say that it gives students the</p> <p>25 opportunity throughout their busy schedules to give them</p>	<p>1 A. He's one of the members on the Commissioners</p> <p>2 Court.</p> <p>3 Q. Is he specifically the Commissioner who</p> <p>4 represents the area of Prairie View?</p> <p>5 A. Yes, from my understanding.</p> <p>6 Q. Did you, after receiving Judge Jackson's text,</p> <p>7 make any efforts to contact the Prairie View</p> <p>8 Commissioner, Commissioner Barnett?</p> <p>9 A. I did not, no.</p> <p>10 Q. Is there somebody you know who did?</p> <p>11 A. I know that other students spoke with different</p> <p>12 officials. I can't say exactly who those officials</p> <p>13 were. But I know there was some type of contact between</p> <p>14 officials and other student leaders, whether it was</p> <p>15 Kirsten Budwine or Kendric Jones or Xante Wallace.</p> <p>16 Q. Okay. But you can't specifically say who</p> <p>17 talked to who?</p> <p>18 A. No, I cannot.</p> <p>19 Q. Or what was said?</p> <p>20 A. Yes, that is correct.</p> <p>21 Q. After receiving -- let me ask you, was Rosa</p> <p>22 Harris copied on Judge Jackson's text?</p> <p>23 A. Yes, she was.</p> <p>24 Q. Did she respond in any way to the text message?</p> <p>25 A. I don't remember if she did or she didn't.</p>

Jayla Allen, et al. vs. Waller County Texas, et al.
Jayla Jenice Allen - 10/11/2019

<p style="text-align: right;">Page 121</p> <p>1 Q. After receiving Judge Jackson's text, did you 2 make any efforts to contact Rosa Harris? 3 A. I didn't, no. 4 Q. You spoke at the -- did you speak at the 5 meeting on October 17th? 6 A. I direct -- no, not directly. 7 Q. You were present at it, though. 8 A. I was. 9 Q. Did you have any conversations with any of the 10 Commissioners before or after the meeting or on a break? 11 A. No, I did not. 12 Q. Did you have any discussions with Christy Eason 13 while you were at the courthouse for that Commissioners 14 Court meeting? 15 A. I believe there was a general, maybe a few 16 words, but not a one-on-one or a direct conversation 17 that we had. 18 Q. Okay. So after the Commissioners Court 19 meeting, you had the meeting that afternoon. 20 A. Uh-huh. I left Commissioners Court early. I 21 had class. And then once I got out of class, I went to 22 the meeting. We held the meeting. 23 Q. And the meeting happened sometime in the 24 afternoon. Do you remember the exact time? 25 A. No, I do not.</p>	<p style="text-align: right;">Page 123</p> <p>1 anything in writing. 2 Q. Who was the general conversation with? 3 A. The same student leaders who were organizing 4 the event. 5 Q. Okay. Of those student leaders, were they all 6 members of The Panther Party? 7 A. No. 8 Q. There were other groups involved as well? 9 A. There was other, yes. 10 Q. And in fact, do you -- can you say for sure 11 whether Dr. Simmons versus the university paid for this? 12 A. I'm almost positive that Dr. Simmons paid for 13 the charter bus out of pocket. It was -- 14 Q. Do you know -- 15 A. -- to my knowledge that she did. 16 Q. Do you know whether she was ever reimbursed by 17 the university for that? 18 A. No. 19 Q. Okay. So there was a bus chartered. Was it a 20 big bus like the one pictured here? 21 A. Yes. 22 Q. And it went to the courthouse -- it looks like 23 there were three trips to the courthouse in Waller -- or 24 in Hempstead on Friday, twenty -- Friday, October 26th, 25 2018.</p>
<p style="text-align: right;">Page 122</p> <p>1 Q. Ultimately, there were -- the university did 2 arrange for some transportation to the Waller County 3 Courthouse in Hempstead for early voting the first week, 4 correct? 5 A. That is correct. 6 Well, I wouldn't necessarily say the 7 university itself. I would say the students of the 8 university and Dr. Simmons personally. But as a 9 collective out of their budget, I'm not sure. 10 MR. SEAQUIST: I'm going to mark Exhibit 11 5. 12 (Exhibit No. 5 marked) 13 Q. (BY MR. SEAQUIST) Have you seen Exhibit 5 14 before? 15 A. I have. 16 Q. What do you recognize this to be? 17 A. This is "Get on the bus. PullUp to the" -- 18 "#PullUp To The Polls," organized by some of us student 19 leaders, some of those who were in that meeting at the 20 Commissioners Court. This exactly was Dr. Simmons' 21 charter bus that she had rented out of her own pocket 22 from my understanding. 23 Q. All right. Who told you that Dr. Simmons paid 24 for this out of her own pocket? 25 A. It was a general conversation. I don't have</p>	<p style="text-align: right;">Page 124</p> <p>1 A. That is correct. 2 Q. Did you ride on any of those trips? 3 A. No, I did not. 4 Q. Did you see the bus when it came to campus? 5 A. I remember seeing the bus. I believe I was 6 preparing to go out of town that day, so I don't -- 7 Q. And do you remember why you were going out of 8 town? 9 A. Yes. I was participating in a conference. 10 Q. What kind of conference? 11 A. A Public Service Institute. I was a Bush 12 fellow. 13 Q. And where were you going? 14 A. College Station. 15 Q. And how long was that conference to last? 16 A. All weekend. 17 Q. So you were coming back Sunday night? 18 A. Yes, but I ended up coming back earlier. 19 Q. When did you end up coming back? 20 A. The next morning, afternoon. 21 Q. So Saturday? 22 A. Yes. Yes. 23 Q. Okay. Do you know how many students used this 24 bus to go to the courthouse in Hempstead to vote? 25 A. No.</p>

Jayla Allen, et al. vs. Waller County Texas, et al.
 Jayla Jenice Allen - 10/11/2019

<p style="text-align: right;">Page 125</p> <p>1 Q. Did you see students getting on the bus?</p> <p>2 A. No.</p> <p>3 Q. Have you talked to any students who used the</p> <p>4 bus service to go vote in Hempstead?</p> <p>5 A. I believe I talked to -- I've talked to several</p> <p>6 students who did as a collective. I can't name any of</p> <p>7 them or say how many. I didn't have much participation</p> <p>8 with the exact day of get on the bus, considering that I</p> <p>9 was preparing for my conference.</p> <p>10 Q. Okay. In terms of the process to actually</p> <p>11 charter this bus, did you play any role in that?</p> <p>12 A. In -- no. No, no, no.</p> <p>13 Q. Do you know who actually called up the bus</p> <p>14 company to rent the bus?</p> <p>15 A. No, I do not.</p> <p>16 Q. Do you know who researched what bus companies</p> <p>17 were available, those kinds of things?</p> <p>18 A. No, I do not.</p> <p>19 Q. Were there any other members of The Panther</p> <p>20 Party present at that afternoon meeting on the 17th?</p> <p>21 A. Kirsten Budwine, Joshua Muhammad, and other</p> <p>22 students who I just cannot name their names.</p> <p>23 Q. But that was not an official Panther Party</p> <p>24 meeting, correct?</p> <p>25 A. No, not at all.</p>	<p style="text-align: right;">Page 127</p> <p>1 A. Yes.</p> <p>2 Q. -- what meetings did you attend where the</p> <p>3 organization of trips to the courthouse were discussed?</p> <p>4 A. There were various meetings. I know of</p> <p>5 different ones. I can't say specifically the times and</p> <p>6 the dates of those; but within the next week we met</p> <p>7 several times, whether it was in the SGA chambers, in</p> <p>8 the Student Memorial Center, within the Student</p> <p>9 Government Association office, the student -- another</p> <p>10 student organization -- well, no, I'm sorry, another</p> <p>11 office where Mrs. Lowe's office is located.</p> <p>12 Q. Okay. You've talked about Mrs. Lowe a couple</p> <p>13 of times. Who is she?</p> <p>14 A. Ms. Lowe is -- she's involved in the student</p> <p>15 engagement department office.</p> <p>16 Q. Is she a university employee?</p> <p>17 A. Yes, that is correct.</p> <p>18 Q. I saw some documentation with a student named</p> <p>19 Maydrian Lowe. I don't suppose -- are they related?</p> <p>20 A. There's no relation.</p> <p>21 Q. No relation. Okay.</p> <p>22 So the meetings that you just described,</p> <p>23 those weren't specifically Panther Party meetings,</p> <p>24 correct?</p> <p>25 A. That is correct.</p>
<p style="text-align: right;">Page 126</p> <p>1 Q. Did you also volunteer to drive students to</p> <p>2 vote at the courthouse in Hempstead during the first</p> <p>3 week of early voting?</p> <p>4 A. I did.</p> <p>5 Q. Do you know how many students you took?</p> <p>6 A. I do not.</p> <p>7 Q. Do you know how many trips you made?</p> <p>8 A. I do not.</p> <p>9 Q. Was it more than one?</p> <p>10 A. I cannot say. I don't remember. I</p> <p>11 participated in a lot of the organizing of it. I know</p> <p>12 that for sure. But I can't speak on anything further.</p> <p>13 Q. When you say "the organizing of it" --</p> <p>14 A. Yes.</p> <p>15 Q. -- what do you mean by that?</p> <p>16 A. Any meetings, conference calls, group messages,</p> <p>17 or text messages where we specifically came up with the</p> <p>18 idea when the idea originated, how we were going to</p> <p>19 format it, getting students to participate, to sign up,</p> <p>20 volunteer, go through the process of putting their name</p> <p>21 on the list to be able to drive them, what times they</p> <p>22 could do it, when they would pick them up, how many</p> <p>23 somebody could take in their car, all those details.</p> <p>24 Q. Okay. Other than the meeting we've talked</p> <p>25 about on the afternoon of the 17th --</p>	<p style="text-align: right;">Page 128</p> <p>1 Q. Did you personally attend each of those</p> <p>2 meetings?</p> <p>3 A. Yes. And I'm sure there's some other meetings</p> <p>4 that I might not have been able to attend.</p> <p>5 Q. Did you participate in obtaining the list or</p> <p>6 soliciting people to volunteer to drive students?</p> <p>7 A. Yes.</p> <p>8 Q. Okay. What did you do to do that?</p> <p>9 A. We posted on social media where students could</p> <p>10 go. Their contact person was Mrs. Lowe if they had any</p> <p>11 questions or -- or wondering like where they could go,</p> <p>12 who could do it, what did you need to be able to or</p> <p>13 qualify to participate.</p> <p>14 Q. How many students ultimately signed up to</p> <p>15 drive?</p> <p>16 A. I can't say exactly. I know there were</p> <p>17 multiple, over 10.</p> <p>18 Q. Over 10?</p> <p>19 And were those just Panther Party members</p> <p>20 or other students as well?</p> <p>21 A. There were other students, various students.</p> <p>22 Q. Was there -- were you involved in coming up</p> <p>23 with a specific schedule for when people would drive?</p> <p>24 A. No.</p> <p>25 Q. Who did that to your knowledge?</p>

Jayla Allen, et al. vs. Waller County Texas, et al.
 Jayla Jenice Allen - 10/11/2019

Page 129	Page 131
<p>1 A. It was more so of the students bringing forth 2 what times they could volunteer. It wasn't necessarily 3 a time that any of us student leaders or organizers said 4 "This is the time you have to take them." 5 Q. Okay. So individuals came up with their own 6 schedule for when they could do that. 7 A. Uh-huh. They volunteered what time they had 8 within their schedules. 9 Q. Did you -- do you know ultimately how many 10 people drove other students? 11 A. No, I do not. 12 Q. Do you know how many other people got rides to 13 vote? 14 A. No, I do not. 15 Q. Do you know how many trips were made? 16 A. No, I do not. 17 Q. Did you -- and you don't remember specifically 18 how many trips you made, right? 19 A. No. 20 Q. Was it -- do you remember specifically anybody 21 you drove? 22 A. I know one personally; but besides that, I 23 can't speak on any names of any other students. 24 Q. Okay. Do you remember how many people you had 25 in your car when you went to the courthouse?</p>	<p>1 through Wednesday, which was the October 29th through 2 the 31st? 3 A. That is correct. 4 Q. And that was at the Memorial Student Center? 5 A. That is correct. 6 Q. And the Commissioners Court had also provided 7 early voting from 7:00 a.m. to 7:00 p.m. in the Waller 8 County Community Center on Thursday, November 1st, and 9 Friday, November 2nd? 10 A. That is correct. 11 Q. You say in your interrogatories that you have 12 never been to the Waller County Community Center. 13 A. That is correct. 14 Q. Is that still true today? 15 A. That is correct. 16 Q. Do you know where the Waller County Community 17 Center is? 18 A. Yes. 19 Q. When did you first learn where the Waller 20 County Community Center is? 21 A. I can't say exactly. 22 Q. Did you know where the Waller County Community 23 Center was prior to the November election? 24 A. Yes, I believe so. 25 Q. Do you know where the post office is?</p>
Page 130	Page 132
<p>1 A. I know I had one for sure the first time. 2 Q. Was that your sister? 3 A. No. No. 4 Q. So as far as you know, you had one. 5 A. Yes. 6 Q. Did you pay for your own gas for that? 7 A. Yes. 8 Q. Were you ever reimbursed for the gas expense? 9 A. No, I was not. 10 Q. Do you know how many miles you drove? 11 A. No, I do not. 12 Q. Other than the October two thousand -- or the 13 October 17th, 2018 meeting, did you attend any other 14 meetings of the Waller County Commissioners Court in 15 advance of the 2018 election? 16 A. No, I did not. 17 Q. Were you there for the October 24th, 2018 18 meeting? 19 A. 24th? No, I was not. 20 Q. All right. Now, you saw the initial hours that 21 the Commissioners Court had adopted for early voting on 22 the Prairie View campus? 23 A. That is correct. 24 Q. And you saw that the Court had originally 25 scheduled early voting from 8:00 to 5:00 on Monday</p>	<p>1 A. Yes. 2 Q. Had you ever been to the post office to mail 3 something? 4 A. Yes. 5 Q. And you had testified earlier that there is a 6 central mailroom here at the university. 7 A. That is correct. 8 Q. Is it still common for students to -- well, if 9 you need to mail out a package, is that something that 10 the mailroom here handles? 11 A. I'm actually not sure. I know I can't buy 12 stamps there. 13 Q. So if students need to buy stamps, is it common 14 for them to go to the post office there? 15 A. Yes. 16 Q. And the post office is just on the edge of the 17 campus. 18 A. Yes. 19 Q. Where did you -- you did vote in the 2018 20 general election, correct? 21 A. Yes. 22 Q. And where did you vote? 23 A. In the early -- during early voting? 24 Q. Did you vote during early voting? 25 A. I did.</p>

Jayla Allen, et al. vs. Waller County Texas, et al.
 Jayla Jenice Allen - 10/11/2019

Page 133	Page 135
<p>1 Q. Okay. Where during early voting did you vote?</p> <p>2 A. Off campus at the courthouse.</p> <p>3 Q. Why did you choose to vote at the courthouse?</p> <p>4 A. Just to clarify, we are talking about the</p> <p>5 midterm election.</p> <p>6 Q. Yes, ma'am.</p> <p>7 A. Yes.</p> <p>8 Q. November of 2018.</p> <p>9 A. Yes. Okay. And can you repeat your last</p> <p>10 question?</p> <p>11 Q. Why did you choose to vote at the courthouse?</p> <p>12 A. So I could participate in early voting.</p> <p>13 Q. You understood that there were early voting</p> <p>14 days at the Memorial Student Center, correct?</p> <p>15 A. Well, yeah, for the following week of those</p> <p>16 three days.</p> <p>17 Q. Okay. Could you have voted at the Memorial</p> <p>18 Student Center during those days if you had chosen to?</p> <p>19 A. I can't say that I could have due to personal</p> <p>20 schedule.</p> <p>21 Q. You had testified earlier that there were</p> <p>22 breaks in your schedule?</p> <p>23 A. Yes, there was breaks in my schedule. During</p> <p>24 those breaks I could have had -- well, I had multiple</p> <p>25 obligations due to my various involvements in work and</p>	<p>1 original address on campus to a new residence?</p> <p>2 A. Yes and no. From my understanding, before,</p> <p>3 when we were registering other students and when we</p> <p>4 registered ourselves to be able to vote within the</p> <p>5 County of Waller, we were using a general 100 University</p> <p>6 Drive address. By that time, then we had moved to -- or</p> <p>7 we were instructed to use the specific addresses of our</p> <p>8 housing complexes.</p> <p>9 Q. Okay. Did you understand that instruction was</p> <p>10 intended as a fix to the registration confusion issues</p> <p>11 that were caused by the 100 versus 700 registration?</p> <p>12 A. Yes, it was -- it was one of them for the time</p> <p>13 being there was.</p> <p>14 Q. How long did it take you to fill out that</p> <p>15 registration card?</p> <p>16 A. A couple of minutes, a few minutes.</p> <p>17 Q. Okay. And how long was the wait to vote at the</p> <p>18 Waller County Courthouse?</p> <p>19 A. I can't say specifically the amount of the</p> <p>20 minutes, but it was a few.</p> <p>21 Q. Okay. All told, how long would you say you</p> <p>22 were at the courthouse to vote?</p> <p>23 A. 10 -- 10 minutes or so.</p> <p>24 Q. Did you complete the change of address form</p> <p>25 before or after you cast your ballot?</p>
Page 134	Page 136
<p>1 other things, so I can't necessarily say that I did have</p> <p>2 the exact time to go and vote during those three</p> <p>3 specific days of early voting.</p> <p>4 Q. Can you say that you had any particular</p> <p>5 conflict that would have kept you from voting during</p> <p>6 those three days?</p> <p>7 A. I can say potentially I did.</p> <p>8 Q. I understand potentially. My question is</p> <p>9 definitively.</p> <p>10 A. I can't say that I did or that I did not.</p> <p>11 Q. Okay. Did you have any problems casting your</p> <p>12 ballot at the courthouse?</p> <p>13 A. Yes.</p> <p>14 Q. What problems?</p> <p>15 A. I was -- a change of address, which</p> <p>16 prolonged -- well, there was a line and then it</p> <p>17 prolonged me being able to vote and then having to take</p> <p>18 the time to change my address, which was an</p> <p>19 additional -- not necessarily a ballot, but application.</p> <p>20 Q. Okay. So we're talking about the November 2018</p> <p>21 election.</p> <p>22 A. Yes, that is correct.</p> <p>23 Q. And you filled out a change of address form?</p> <p>24 A. Yes.</p> <p>25 Q. That is because you had moved from your</p>	<p>1 A. I believe it was after.</p> <p>2 Q. Okay. You testified that you had been to the</p> <p>3 post office in Waller County?</p> <p>4 A. That is correct.</p> <p>5 MR. SEAQUIST: I'm marking Exhibit 6.</p> <p>6 (Exhibit No. 6 marked)</p> <p>7 Q. (BY MR. SEAQUIST) I'll hand you what I've</p> <p>8 marked as Exhibit 6.</p> <p>9 A. Thank you.</p> <p>10 Q. I'll represent to you, Ms. Allen, that Exhibit</p> <p>11 6 is a Google satellite image that I've printed.</p> <p>12 A. That is correct.</p> <p>13 Q. Do you recognize any of the features in the</p> <p>14 picture here?</p> <p>15 A. Yes.</p> <p>16 Q. What do you see that you recognize?</p> <p>17 A. The entire campus.</p> <p>18 Q. Okay.</p> <p>19 A. Or a section of the campus.</p> <p>20 Q. Do you see the football stadium?</p> <p>21 A. I do.</p> <p>22 Q. And that is the football stadium for Prairie</p> <p>23 View A&M?</p> <p>24 A. That is correct.</p> <p>25 Q. And does that help you orient what we're</p>

Jayla Allen, et al. vs. Waller County Texas, et al.
 Jayla Jenice Allen - 10/11/2019

Page 137	Page 139
<p>1 looking at here?</p> <p>2 A. Yes.</p> <p>3 Q. Does this image fairly and accurately depict</p> <p>4 the portion of the campus that's displayed there?</p> <p>5 A. Yes.</p> <p>6 Q. Do you see the Postal Service?</p> <p>7 A. I do.</p> <p>8 Q. Is it accurately reflected in this drawing --</p> <p>9 or in this image?</p> <p>10 A. Yes.</p> <p>11 Q. Now, are you aware that there is a sidewalk</p> <p>12 from campus that leads to the post office parking lot?</p> <p>13 A. I am now aware.</p> <p>14 Q. Do you see it in the image there?</p> <p>15 A. Yes, I can see it.</p> <p>16 MS. ADEN: Objection. Are you</p> <p>17 representing that there is a sidewalk or are you asking</p> <p>18 her does she know if there's a sidewalk?</p> <p>19 MR. SEAQUIST: Well, she says she saw it,</p> <p>20 so --</p> <p>21 MS. ADEN: But before you asked her is she</p> <p>22 aware that there's a sidewalk. So are you representing</p> <p>23 to her that there is a sidewalk?</p> <p>24 MR. SEAQUIST: Well, I will represent to</p> <p>25 her that there is a sidewalk, but my question was</p>	<p>1 A. Next to the post office.</p> <p>2 Q. Okay. Will you circle it with this black</p> <p>3 marker?</p> <p>4 A. (Witness complied).</p> <p>5 Q. Thank you.</p> <p>6 A. Here you go.</p> <p>7 Q. Okay. Are you familiar with the Hobart Taylor</p> <p>8 Hall?</p> <p>9 A. Yes.</p> <p>10 Q. Have you ever had classes in the Hobart Taylor</p> <p>11 Hall?</p> <p>12 A. Excuse me. I apologize.</p> <p>13 Q. That's all right.</p> <p>14 A. Summer of 2019 I did.</p> <p>15 Q. Is it pretty standard for Prairie View students</p> <p>16 at some point during their time here to have a class in</p> <p>17 the Hobart Taylor Hall?</p> <p>18 A. I can't say that there is or there isn't.</p> <p>19 Q. Okay. Now, PVAMU operates a series of</p> <p>20 shuttles, correct?</p> <p>21 A. Yes, for off-campus students.</p> <p>22 Q. Okay. Is there also a campus loop shuttle that</p> <p>23 goes around the campus?</p> <p>24 A. I heard that there was one. I haven't</p> <p>25 physically seen it or been able to use it.</p>
Page 138	Page 140
<p>1 whether she was aware of it.</p> <p>2 MS. ADEN: But it assumes a fact that is</p> <p>3 not in evidence or that has not been made yet by her.</p> <p>4 MR. SEAQUIST: Is that an objection to</p> <p>5 form?</p> <p>6 MS. ADEN: That is an objection to form.</p> <p>7 MR. SEAQUIST: Duly noted.</p> <p>8 Q. (BY MR. SEAQUIST) In looking at Exhibit 5 --</p> <p>9 A. Exhibit 6?</p> <p>10 Q. 6. Sorry.</p> <p>11 You just testified that you see the</p> <p>12 sidewalk that runs from campus to the post office</p> <p>13 parking lot, correct?</p> <p>14 A. That is correct.</p> <p>15 Q. Were you aware that that sidewalk existed prior</p> <p>16 to looking at this image?</p> <p>17 A. I can't say that I did or I did not.</p> <p>18 Q. Okay. Had you ever walked to the post office</p> <p>19 from campus?</p> <p>20 A. No.</p> <p>21 Q. In looking at this image, are you able to</p> <p>22 identify the location of the Waller County Community</p> <p>23 Center?</p> <p>24 A. Yes.</p> <p>25 Q. And can you describe it for me?</p>	<p>1 Q. Okay. You've never ridden it?</p> <p>2 A. No. I don't even think it's in service.</p> <p>3 Q. Have you ever actually looked into what the bus</p> <p>4 schedules are or the shuttle schedules are?</p> <p>5 A. No, I have not.</p> <p>6 Q. As a student on campus, do you need the shuttle</p> <p>7 service to get from one side of the campus to the other?</p> <p>8 A. No, I do not.</p> <p>9 Q. Is that something you would just walk to do?</p> <p>10 A. To get to which location?</p> <p>11 Q. Just to get around campus.</p> <p>12 A. Yes. If it's within distance, yes.</p> <p>13 Q. Do you ever drive to get from one place on</p> <p>14 campus to another?</p> <p>15 A. Yes.</p> <p>16 Q. Okay. Where would you drive from?</p> <p>17 A. To -- from my location of University Square to</p> <p>18 anywhere that's within a far distance.</p> <p>19 Q. For example?</p> <p>20 A. So for example, the post office.</p> <p>21 Q. Okay. Do you ever go to football games?</p> <p>22 A. No.</p> <p>23 Q. Do you ever go to the athletic complex?</p> <p>24 A. No.</p> <p>25 Q. When you went to class at Hobart Taylor Hall in</p>

Jayla Allen, et al. vs. Waller County Texas, et al.
 Jayla Jenice Allen - 10/11/2019

Page 141	Page 143
<p>1 the summer of 2019, did you drive there?</p> <p>2 A. I did.</p> <p>3 Q. When you go -- are there any other locations</p> <p>4 that you would drive to that are on campus?</p> <p>5 A. Yes, the Panther Plaza.</p> <p>6 Q. Okay. Did you ever walk to the Hobart Taylor</p> <p>7 Hall?</p> <p>8 A. No.</p> <p>9 Q. When you -- well, scratch that.</p> <p>10 Are you aware of any student groups that</p> <p>11 have held events at the community center?</p> <p>12 A. No, I am not.</p> <p>13 Q. You're not a member of the sorority here,</p> <p>14 right?</p> <p>15 A. That is correct.</p> <p>16 Q. Do you have any reason to dispute that the</p> <p>17 sorority has used the community center for events?</p> <p>18 A. No.</p> <p>19 Q. Do you know anyone who voted at the community</p> <p>20 center in the fall of 2018?</p> <p>21 A. No, I do not.</p> <p>22 Q. Did you ever post any social media messages</p> <p>23 informing students of their ability to go vote at the</p> <p>24 community center?</p> <p>25 A. It was on the general schedule, so -- and I did</p>	<p>1 additional early voting hours in the City of Prairie</p> <p>2 View?</p> <p>3 A. Yes.</p> <p>4 Q. October 24th, not the 14th. Is that right?</p> <p>5 A. Yes.</p> <p>6 (Discussion off the record)</p> <p>7 Q. (BY MR. SEAQUIST) Ms. Allen, let me correct my</p> <p>8 misstatement in my last question.</p> <p>9 My question is: Are you aware that on</p> <p>10 October 24th, 2018, the Waller County Commissioners</p> <p>11 Court extended the early voting hours in the City of</p> <p>12 Prairie View?</p> <p>13 A. Yes.</p> <p>14 Q. Okay.</p> <p>15 A. And I also knew what you meant or I heard -- I</p> <p>16 thought I --</p> <p>17 Q. Okay. Thank you.</p> <p>18 (Exhibit No. 7 marked)</p> <p>19 Q. (BY MR. SEAQUIST) I've handed you what I've</p> <p>20 marked as Exhibit 11.</p> <p>21 A. Yes.</p> <p>22 Q. No, it's not. It's 7.</p> <p>23 A. I'm sorry. Exhibit 7.</p> <p>24 Q. Sorry.</p> <p>25 Exhibit 7 -- have you seen Exhibit 7</p>
Page 142	Page 144
<p>1 post that and repost it, so it would have been on there.</p> <p>2 Q. Okay. After the conclusion of early voting at</p> <p>3 the Memorial Center, the Memorial Student Center, after</p> <p>4 Wednesday, did you ever send out any social media</p> <p>5 messages encouraging students to -- who hadn't voted yet</p> <p>6 to go over to the community center?</p> <p>7 A. I reposted the schedule.</p> <p>8 Q. Is that a no?</p> <p>9 A. No, I wouldn't say that's a no.</p> <p>10 Q. Okay. My question is: After the Wednesday of</p> <p>11 early -- of the second week of early voting, did you</p> <p>12 specifically send out any social media messages</p> <p>13 encouraging people or reminding people that they could</p> <p>14 still go vote at the community center?</p> <p>15 A. I would say that I did, considering that I</p> <p>16 posted and reposted a schedule that detailed the places</p> <p>17 and when they could vote during that time of that</p> <p>18 election.</p> <p>19 Q. Other than just posting the general schedule,</p> <p>20 did you send any messages specifically reminding</p> <p>21 students that they could still vote at the community</p> <p>22 center?</p> <p>23 A. I can't say that I did or that I did not.</p> <p>24 Q. Okay. Now, are you also aware that on October</p> <p>25 2014 the Waller County Commissioners Court added</p>	<p>1 before?</p> <p>2 A. Yes.</p> <p>3 Q. And do you recognize this to be the extended</p> <p>4 early voting schedule?</p> <p>5 A. Extended?</p> <p>6 Q. Yes. And by extended, I mean it reflects the</p> <p>7 increased hours added by the Waller County Commissioners</p> <p>8 Court on October 24th.</p> <p>9 A. For Prairie View A&M University Memorial</p> <p>10 Center?</p> <p>11 Q. Well, yes, among other places, which we'll go</p> <p>12 through.</p> <p>13 My question is: Just in looking at this</p> <p>14 extended -- or this schedule, have you seen it before?</p> <p>15 A. Yes, I have seen this schedule.</p> <p>16 Q. Okay.</p> <p>17 MS. ADEN: And you also said October 24th.</p> <p>18 I think you meant 29th.</p> <p>19 MR. SEAQUIST: No. That one, I meant</p> <p>20 24th.</p> <p>21 MS. ADEN: Sorry. Okay.</p> <p>22 MR. SEAQUIST: I can trip myself up well</p> <p>23 enough without you trying to help me out.</p> <p>24 Q. (BY MR. SEAQUIST) In the extended hours, the</p> <p>25 Commissioners Court extended the hours at the Memorial</p>

Jayla Allen, et al. vs. Waller County Texas, et al.
 Jayla Jenice Allen - 10/11/2019

<p style="text-align: right;">Page 145</p> <p>1 Student Center on Monday through Wednesday from 8:00 to 2 5:00 to 7:00 to 7:00, correct? 3 A. That is correct. 4 Q. And the Commissioners Court also added Sunday 5 voting before the second week of early voting at the 6 Prairie View city hall; is that right? 7 A. Yes, off campus. 8 Q. Okay. When these extended hours came out, did 9 you share them on social media? 10 A. I'm sure I did. 11 Q. On Monday through Wednesday, when early voting 12 was taking place at the Memorial Student Center, as the 13 precinct chair there, did you go and observe? 14 A. No, not -- no. 15 Q. Did you -- just being at the -- were you at the 16 student center at any point during those three days? 17 A. I might have. I can't say specifically if I 18 was or if I wasn't. 19 Q. Okay. And did you see the early voting area? 20 A. I might have. I -- I can't say directly that I 21 did. 22 Q. Okay. Did you talk to anybody about their 23 experience voting early on campus at the Memorial 24 Student Center? 25 A. I believe I did.</p>	<p style="text-align: right;">Page 147</p> <p>1 Q. Both. 2 A. No, I can't say that I did or that I did not. 3 Q. Okay. Do you know whether there was a 4 statement by the Secretary of State saying that students 5 would be able to vote in 309? 6 A. Yes. 7 Q. And that statement said that they would be able 8 to vote in 309 regardless of where they were registered 9 as long as they were registered in Waller County, right? 10 A. I can't necessarily recall exactly the 11 statement. I do remember a statement and what it said. 12 I'm pretty sure I read through it at that time, but that 13 was a year ago, and I remember posting about it. 14 Q. Okay. Do you also remember the County 15 announcing that students would not be required to fill 16 out a change of -- a change of residence form before 17 they cast their ballot? 18 A. I do remember. 19 Q. Are you aware of any issues with long lines 20 during early voting at the Memorial Student Center in 21 the 2018 general election? 22 A. I can't say that I -- I can't say yes or no. 23 Q. Are you aware that the County doubled the 24 number of controlling -- controllers for voting machines 25 at the student center?</p>
<p style="text-align: right;">Page 146</p> <p>1 Q. Okay. Did anybody express any difficulties to 2 you casting a ballot early at the Memorial Student 3 Center? 4 A. I'm unsure. 5 Q. Not that you recall? 6 A. Yes. Well, no, I'm unsure. 7 Q. What are you unsure about? 8 A. If I had conversations with students about 9 difficulties. 10 Q. Sitting here today, you can't tell us any 11 reports of difficulties that you received from other 12 Prairie View students about voting early in the Memorial 13 Student Center? 14 A. For those three days? No, I cannot. The only 15 thing I will say was just the repeated address -- change 16 of address forms. But besides that, I cannot. 17 Q. Okay. And again, to vote early at the Memorial 18 Student Center, it didn't matter where you were 19 registered, right? 20 A. That is correct. 21 Q. And was it your understanding in the fall of 22 2018 leading up to the election that the County had 23 announced that you would be able to vote in 309 24 regardless of where you were registered? 25 A. On election day or early voting?</p>	<p style="text-align: right;">Page 148</p> <p>1 A. I knew of an increase. I can't say an exact 2 number or how many. 3 Q. Are you aware that the student center had the 4 greatest number of voting machines of any precinct? 5 A. Yes, due to the amount of students those 6 machines were for versus the other populations within 7 the county and in those cities and in those precincts. 8 MR. SEAQUIST: I'm going to object, 9 nonresponsive, after "Yes". 10 Q. (BY MR. SEAQUIST) You say in your interrogatory 11 responses, specifically in response to No. 8, that you 12 had to rearrange your limited schedule to vote. 13 A. That is correct. 14 Q. What specifically did you have to rearrange to 15 cast a ballot? 16 A. I can't remember exactly. As mentioned, with 17 the various obligations and class schedules at that 18 time, I did; and then also partaking in trying to 19 organize and engage the students, I did. 20 Q. Did you have to miss class to go -- did you 21 miss class to go vote? 22 A. I don't think I did, no. 23 After this set of questions, can I use the 24 restroom? 25 MR. SEAQUIST: You can do it now.</p>

Jayla Allen, et al. vs. Waller County Texas, et al.
 Jayla Jenice Allen - 10/11/2019

<p style="text-align: right;">Page 149</p> <p>1 (Recess from 1:08 p.m. to 1:15 p.m.)</p> <p>2 Q. (BY MR. SEAQUIST) Okay. We left off -- we've</p> <p>3 had a break. Is there anything you need to correct from</p> <p>4 your testimony before?</p> <p>5 A. No.</p> <p>6 Q. We were talking about how you rearranged your</p> <p>7 schedule to vote. And you had talked about, voting at</p> <p>8 the hours provided at the Memorial Student Center, you</p> <p>9 might have had to rearrange some of the activities that</p> <p>10 you had there.</p> <p>11 A. That is correct.</p> <p>12 Q. And did you have to rearrange your activities</p> <p>13 to go vote at the courthouse?</p> <p>14 A. I might have.</p> <p>15 Q. Okay. And would it have taken you longer to</p> <p>16 rearrange your activities -- excuse me.</p> <p>17 Would you have had to rearrange a larger</p> <p>18 period of time to go vote at the courthouse or at the</p> <p>19 Memorial Student Center?</p> <p>20 A. The courthouse.</p> <p>21 Q. But ultimately, you chose to go vote at the</p> <p>22 courthouse.</p> <p>23 A. Yes.</p> <p>24 Q. You also stated in your response that you</p> <p>25 incurred the travel costs, including time spent and</p>	<p style="text-align: right;">Page 151</p> <p>1 A. I would say it's the only college campus in</p> <p>2 Waller County that houses 9,000 students that use a</p> <p>3 central location to go vote, who all don't have a car to</p> <p>4 go and travel to vote off campus of where they live or</p> <p>5 within their community.</p> <p>6 MR. SEAQUIST: Objection, nonresponsive.</p> <p>7 Q. (BY MR. SEAQUIST) My question is: Can you</p> <p>8 think of any other -- are you aware of any other voting</p> <p>9 location in Waller County where people were able to go</p> <p>10 vote right at the area where they lived?</p> <p>11 A. No.</p> <p>12 Q. As the elected Democratic precinct chair, do</p> <p>13 you see it as your responsibility to try to mobilize</p> <p>14 voters and get them to the polls?</p> <p>15 A. I would say I took on that position or that --</p> <p>16 I would say that I took on that duty. I wouldn't</p> <p>17 necessarily say that it was within my duties.</p> <p>18 Q. On election day, I understand there was a</p> <p>19 Parade of Voters.</p> <p>20 A. Yes.</p> <p>21 Q. Did you participate in that?</p> <p>22 A. I did.</p> <p>23 Q. Did you march?</p> <p>24 A. I did. Also the organizers spent time on a</p> <p>25 tractor.</p>
<p style="text-align: right;">Page 150</p> <p>1 funds spent on gas, going to vote. Is that right?</p> <p>2 A. Yes.</p> <p>3 Q. Now, you wouldn't have incurred those costs if</p> <p>4 you had elected to vote at the student center, right?</p> <p>5 A. I would have, because I would have still</p> <p>6 participated in helping other students.</p> <p>7 Q. Okay. Those costs were not necessary for you</p> <p>8 to cast a ballot, though, right?</p> <p>9 A. Not individually, no.</p> <p>10 Q. Do you have any reason to believe that voters</p> <p>11 in Hockley, for example, didn't have to incur travel</p> <p>12 time or fuel costs if they wanted to go cast an early</p> <p>13 ballot?</p> <p>14 A. I'm not sure on Hockley.</p> <p>15 Q. Is it fair to say that other voters in the</p> <p>16 county would have had to rearrange their schedule to go</p> <p>17 cast an early ballot?</p> <p>18 A. They might have.</p> <p>19 Q. Is it fair to say that other voters in the</p> <p>20 county might have had to drive to go cast a ballot?</p> <p>21 A. Yeah, if they don't live on a college campus.</p> <p>22 Q. In fact, is it fair to say that Prairie View</p> <p>23 A&M is really the only location in Waller County where</p> <p>24 people have the opportunity to vote right where they</p> <p>25 lived, ate their meals, took their courses, et cetera?</p>	<p style="text-align: right;">Page 152</p> <p>1 Q. What were you doing on a tractor?</p> <p>2 A. Speaking, handing out water, engaging the</p> <p>3 students, just -- we were just there.</p> <p>4 Q. Where did the tractor come from?</p> <p>5 A. I'm not sure.</p> <p>6 Q. Do you know who secured the tractor?</p> <p>7 A. No, I do not.</p> <p>8 Q. Did you ride on the tractor?</p> <p>9 A. I did.</p> <p>10 Q. Was it like a tractor with a trailer behind it?</p> <p>11 A. Well, yeah. It was more like the -- we were on</p> <p>12 the trailer. Let me specify. We were on the trailer.</p> <p>13 Q. So like a flatbed.</p> <p>14 A. Yeah.</p> <p>15 Q. Okay. Did you -- did the organizers of the</p> <p>16 march mark off the course for where the walk would go?</p> <p>17 A. No.</p> <p>18 Q. There was a planned --</p> <p>19 A. Or I didn't. If they did, then I wasn't aware</p> <p>20 of it.</p> <p>21 Q. There was a planned route for the march,</p> <p>22 though; is that right?</p> <p>23 A. Yes.</p> <p>24 (Exhibit No. 8 marked)</p> <p>25 Q. (BY MR. SEAQUIST) I'm going to hand you what I</p>

Jayla Allen, et al. vs. Waller County Texas, et al.
 Jayla Jenice Allen - 10/11/2019

<p style="text-align: right;">Page 153</p> <p>1 have marked as Exhibit 8.</p> <p>2 A. Thank you.</p> <p>3 Q. Do you recognize Exhibit 8?</p> <p>4 A. I do.</p> <p>5 Q. And what is Exhibit 8?</p> <p>6 A. A tweet from Maia Young, M-a-i-a.</p> <p>7 Q. And this is a tweet that you retweeted?</p> <p>8 A. This is correct.</p> <p>9 Q. And this is announcing the Parade of Voters to</p> <p>10 take place on November 6th?</p> <p>11 A. That is correct.</p> <p>12 Q. And did the -- there's a flyer that you</p> <p>13 retweeted here, too, correct?</p> <p>14 A. The Parade of Voters, yes, that is correct.</p> <p>15 Q. Do you know who created that flyer?</p> <p>16 A. No.</p> <p>17 Q. Okay. It specifies that the -- the parade</p> <p>18 would depart from the UC courtyard at 10:00 a.m.</p> <p>19 A. That is correct.</p> <p>20 Q. Did you understand that this was going to be a</p> <p>21 walkout?</p> <p>22 A. A walkout of where?</p> <p>23 Q. Do you know what a walkout is or have you heard</p> <p>24 that term before?</p> <p>25 A. I've heard of the term, I mean, in a general</p>	<p style="text-align: right;">Page 155</p> <p>1 A. Others joined along.</p> <p>2 Q. Okay.</p> <p>3 A. Some of us met there and started there.</p> <p>4 Q. How many people would you say started the</p> <p>5 march?</p> <p>6 A. I don't have a number, but it was plenty of</p> <p>7 students.</p> <p>8 Q. Okay. Do you remember the route you took?</p> <p>9 A. For the most part.</p> <p>10 Q. Do you see on Exhibit 8 there is a partial map</p> <p>11 there marking a route?</p> <p>12 A. Yeah. It's not very clear, but I do see the</p> <p>13 picture.</p> <p>14 Q. Okay. And here, the beginning of the -- does</p> <p>15 it look to you that the beginning of the route that's</p> <p>16 marked on this map on Exhibit 8 is the University View?</p> <p>17 A. That is correct.</p> <p>18 Q. Did you march from -- starting from the</p> <p>19 University College courtyard to the University View?</p> <p>20 A. No, we did not.</p> <p>21 Q. Okay. Where did you all end up going?</p> <p>22 A. Just to the MSC, the Student Memorial Center.</p> <p>23 Q. Okay. What route did you take to get to the</p> <p>24 Memorial Center?</p> <p>25 A. From my understanding, it looks as though it</p>
<p style="text-align: right;">Page 154</p> <p>1 sense.</p> <p>2 Q. So a plan where students would walk out of</p> <p>3 class to participate in the march.</p> <p>4 A. Yes.</p> <p>5 Q. Okay. And was there some way that there was --</p> <p>6 well, it says "Listen for the air horns at 9:50".</p> <p>7 A. Uh-huh.</p> <p>8 Q. Is it your understanding that that was going to</p> <p>9 signal the start or to gather for the march?</p> <p>10 A. I can't say that I do or I didn't -- I did or I</p> <p>11 didn't, considering there's classes all over campus and</p> <p>12 we were right there in that location, pointing at the</p> <p>13 University College.</p> <p>14 Q. I understand.</p> <p>15 Did you miss any classes to participate in</p> <p>16 the march?</p> <p>17 A. I don't think so.</p> <p>18 Q. It says that the parade would depart from the</p> <p>19 UC courtyard?</p> <p>20 A. That is correct.</p> <p>21 Q. And you just told us it's across the street</p> <p>22 here. That's also the courtyard of where you initially</p> <p>23 lived when you first moved to campus, right?</p> <p>24 A. That is correct.</p> <p>25 Q. Is that where everybody did, in fact, meet up?</p>	<p style="text-align: right;">Page 156</p> <p>1 was just in the circle that's on the map.</p> <p>2 MR. SEAQUIST: Okay. Let's do this. I'm</p> <p>3 going to mark Exhibit 9.</p> <p>4 (Exhibit No. 9 marked)</p> <p>5 MS. ADEN: Can I have one, Gunnar?</p> <p>6 MR. SEAQUIST: This would have been --</p> <p>7 yeah. I'm sorry.</p> <p>8 MS. ADEN: Thank you.</p> <p>9 Q. (BY MR. SEAQUIST) Okay. Exhibit 9 is a</p> <p>10 slightly better, though still not perfect, copy of the</p> <p>11 parade flyer that we looked at; is that right?</p> <p>12 A. Yes, without the map.</p> <p>13 Q. Without the map, correct.</p> <p>14 And at the bottom of the flyer does it</p> <p>15 outline the parade route?</p> <p>16 A. When you say "outline" --</p> <p>17 Q. Or does it describe?</p> <p>18 A. I wouldn't -- this is really small.</p> <p>19 Okay. Yes, it does. It's listed on</p> <p>20 there.</p> <p>21 Q. Okay. And so it says UC courtyard.</p> <p>22 A. Yes, that is correct.</p> <p>23 Q. And then it says the View.</p> <p>24 A. That is correct.</p> <p>25 Q. But your testimony is you don't think that the</p>

Jayla Allen, et al. vs. Waller County Texas, et al.
Jayla Jenice Allen - 10/11/2019

Page 157	Page 159
<p>1 parade actually went to the View. 2 A. No, I'm -- I'm testifying that we didn't. 3 Q. Okay. 4 A. Not that I think. I'm sure. 5 Q. Okay. The next -- it's not clearly written 6 there; but if you looked at this on a computer, it's 7 pretty clear that it says Phase III. Do you know where 8 Phase III is? 9 A. Yes, that's correct. 10 Q. And was that part of the route? 11 A. Yes, we passed Phase III. 12 Q. All right. And then Phase I and II? Do you 13 know what that building is? 14 A. Yes. Yes, I know where Phase I and II is. 15 Q. And was that on the route? Did you all go by 16 that? 17 A. I believe so. 18 Q. Okay. And then it says the athletic complex. 19 What does the athletic complex mean to you? 20 A. The athletic complex is what is -- I guess you 21 would say the gym, the rec center, also the stadium, but 22 not more so the stadium. It's right by the -- well, 23 it's not right by it, but it's near the MSC. But we 24 really crossed over in our route. 25 Q. Okay. And then you went to the MSC, correct?</p>	<p>1 University Square. 2 Q. Okay. 3 A. And that's right here (indicating). 4 Q. Okay. Where did you go next? 5 A. We just went around -- what is 39? 6 MS. ADEN: Transportation center? 7 THE WITNESS: The transportation center. 8 Where's JJ, juvenile justice? I cannot 9 see anything on this map. 10 Q. (BY MR. SEAQUIST) Juvenile justice and 11 psychology appears to be 49. 12 A. 49? Okay. 49, 49, 49. That's juvenile 13 justice. Okay. 14 Yeah. Okay. So I believe we continued -- 15 yeah. Okay. 16 Q. Okay. And do you know how then you would have 17 gotten to Phase I and Phase II after that? 18 A. What's No. 53? The gym, the old gym. 52 is 19 university -- 20 THE REPORTER: I'm sorry. He coughed. I 21 couldn't hear you. 22 THE WITNESS: I was calling out the 23 numbers, 51 and 52. And I believe the -- we maybe went 24 this way. Where is the MSC? What number is the MSC? 25 58.</p>
Page 158	Page 160
<p>1 A. Yes. We went in front of the MSC. 2 Q. Wound up at the MSC? 3 Let me hand you this marker. And if you 4 look back at Exhibit 2, which was the map we had -- 5 A. That is correct. 6 Q. It's the one underneath that. 7 If you would, I'd like you to draw me your 8 recollection of the route. So starting at the UC 9 courtyard -- 10 A. UC courtyard is 30, correct? 11 Q. I believe the UC courtyard is actually 7. 12 A. Okay. 7? 13 MS. ADEN: 7 is University College. 14 MR. SEAQUIST: Yeah, University College 15 courtyard. 16 MS. ADEN: Okay. 17 THE WITNESS: Okay. 18 Q. (BY MR. SEAQUIST) Okay. Which way did you guys 19 leave to go -- or leave from the University courtyard? 20 By "you guys," I mean the march on November 6th. 21 A. This way (indicating). 22 Q. All right. And the next stop -- you did not go 23 to the View, you testified. The next stop would have 24 been Phase III? 25 A. Actually, we stopped right in front of</p>	<p>1 Q. (BY MR. SEAQUIST) Now, did you go -- the next 2 thing on the list is the athletic complex. Did you go 3 to the athletic complex? 4 A. We pass -- I believe we passed the athletic 5 complex. 6 Q. Okay. Well, draw the route that you recall 7 going. 8 A. Okay. This part, I don't remember exactly 9 where. Yeah. No, I don't exactly remember. 10 Q. Okay. 11 A. But I know we ended up in front of 58. I don't 12 remember what street, what turns to -- in getting in 13 front of the MSC. 14 Q. Okay. So at the time this march took place, 15 you had already voted early at the Hempstead courthouse, 16 correct? 17 A. That's correct. 18 Q. And there had already been three days of early 19 voting on campus in Prairie View from 7:00 to 7:00, 20 correct? 21 A. That is correct. 22 Q. And there had already been two full days of 23 early voting from 7:00 to 7:00 at the Waller County 24 Community Center, correct? 25 A. That is correct.</p>

Jayla Allen, et al. vs. Waller County Texas, et al.
 Jayla Jenice Allen - 10/11/2019

<p style="text-align: right;">Page 161</p> <p>1 Q. And on the day of this march, election day, 2 there was election day voting going on from 7:00 to 7:00 3 at the Memorial Student Center. 4 A. That is correct. 5 Q. And so was part of the plan for this march to 6 end up at the Memorial Student Center so that anybody 7 who hadn't voted yet could then, at the conclusion of 8 the march, go in and vote? 9 A. That is correct. 10 Q. Okay. Do you know or did anybody look at, in 11 mapping out the parade route, what the distance of that 12 would be? 13 A. I can't say yes or no. 14 Q. Was the parade well attended in your opinion? 15 A. Yes. 16 Q. If we look at -- look back to Exhibit 8. On 17 the following pages there are some pictures. 18 A. That is correct. 19 Q. Do you recognize those to be pictures of the 20 march in progress? 21 A. I wouldn't say in progress. This is a -- this 22 is a picture of us in front of the Student Memorial 23 Center. 24 Q. Okay. The next page. 25 A. Yes.</p>	<p style="text-align: right;">Page 163</p> <p>1 Q. The photo immediately below Mr. Siegel, do you 2 recognize that individual? 3 A. Yes. 4 Q. Who is that? 5 A. Nev, Nev, some -- 6 Q. Do you know -- 7 A. -- person that's famous or -- 8 Q. Do you know -- 9 A. -- was famous. 10 Q. Sorry. 11 Do you know the source of his acclaim? 12 A. No. 13 Q. Do you know why he was on campus that day? 14 A. Not at all. No one knew that he was coming. 15 He just kind of showed up when we started marching. 16 Q. The picture in the bottom right, do you -- can 17 you identify where that was taken? 18 A. That's the panther. That is in front of the 19 Student Memorial Center. 20 Q. All right. The next page, 114. 21 A. Yes. 22 Q. And this is a picture you retweeted? 23 A. Yes. 24 Q. Yeah. Does this show, again, the march in 25 progress?</p>
<p style="text-align: right;">Page 162</p> <p>1 Q. Okay. Is that a picture of the march in 2 progress? 3 A. Yes, this is different pictures at various 4 points. Two of these pictures are at the Student 5 Memorial Center. One is on the panther. One is way 6 after, it looks as though. 7 Q. What makes you say it looks way after? 8 A. There's no one behind Xante Wallace. 9 Q. That's the picture in the top right? 10 A. That is correct. 11 Q. And Mr. Wallace is a council member for the 12 City of Prairie View? 13 A. That is correct. 14 Q. In the top left picture -- this is the third 15 page of the exhibit we're talking about. It's Bates 16 labeled Plaintiffs 112. Do you recognize the gentleman 17 walking in the top left corner? 18 A. Yes, I do. 19 Q. Who is that? 20 A. Mike Siegel. 21 Q. And who was Mr. Siegel? 22 A. He is a -- well, at the time he was running for 23 the 10th Congressional seat. 24 Q. Okay. So a House of Representatives candidate? 25 A. Yes.</p>	<p style="text-align: right;">Page 164</p> <p>1 A. This is -- yes. 2 Q. Okay. Ms. Allen, as a plaintiff in this 3 lawsuit, is it your contention that the Waller County 4 Commissioners Court adopted the early voting schedule 5 for the twenty-one eighteen general election to 6 intentionally discriminate against African-Americans in 7 Waller County? 8 A. Can you repeat the question? 9 Q. Yes. 10 As a plaintiff in this lawsuit -- and you 11 are a named plaintiff. 12 A. Yes, that is correct. 13 Q. Is it your contention that the Waller County 14 Commissioners Court adopted the early voting schedule 15 for the 2018 general election to intentionally 16 discriminate against African-American voters in Waller 17 County? 18 A. Yes. 19 Q. What is the basis for that contention? 20 A. For one, the history of Prairie View A&M 21 University students. It's not all of Waller County. 22 It's particularly the students and the African-American 23 residents of this county. And for a long time there has 24 been an ongoing issue of voter suppression within this 25 county with its black residents or African-American</p>

Jayla Allen, et al. vs. Waller County Texas, et al.
 Jayla Jenice Allen - 10/11/2019

<p style="text-align: right;">Page 165</p> <p>1 residents who attend Prairie View A&M University. 2 And in those -- in my opinion, and in the 3 facts of history, it has been seen that different -- 4 different acts by county officials within the County of 5 Waller has -- has put -- or has suggested different 6 things. But also, in the main state, I will say that it 7 was voter suppression amongst African-Americans, 8 particularly the students of Prairie View. 9 Q. Other than the history that you have just 10 talked about, is there any basis -- any other basis for 11 your contention that this Waller County Commissioners 12 Court acted intentionally to discriminate against 13 African-American voters in early voting in 2018? 14 A. I would also say going to Commissioners Court 15 and asking for more days or more hours that we were once 16 again denied, so -- 17 Q. Okay. Other than that, is there any other 18 basis? 19 A. No. 20 Q. Are there any individual statements that you 21 have heard with your own ears or that have been reported 22 to you by any Waller County official that you can point 23 me to that would suggest Waller County was trying to 24 intentionally discriminate through the adoption of early 25 voting hours in 2018?</p>	<p style="text-align: right;">Page 167</p> <p>1 lawsuits? 2 A. No, I have not. 3 MR. SEAQUIST: Can we take two minutes? 4 MS. ADEN: Yeah. Can we actually turn 5 that into like a 10-minute break so we can get our 6 redirect together since it looks like you're near the 7 end? 8 MR. SEAQUIST: Yes. 9 (Recess from 1:41 p.m. to 2:02 p.m.) 10 Q. (BY MR. SEAQUIST) All right, Ms. Allen. Have 11 you understood the questions that I've asked you today? 12 A. Yes, I have. 13 Q. And if you didn't -- if there's a question I 14 asked that you didn't understand, did you ask me to 15 clarify it? 16 A. Yes. 17 Q. And was I able to do so to your satisfaction? 18 A. Yes. 19 Q. Okay. Have I been courteous to you in the 20 deposition today? 21 A. Yes. 22 MR. SEAQUIST: All right. I thank you for 23 your time. 24 And I will pass the witness. 25 MS. ADEN: All right.</p>
<p style="text-align: right;">Page 166</p> <p>1 A. I couldn't say that I have or that I have not. 2 Q. As a plaintiff in this lawsuit, is it your 3 contention that the Waller County Commissioners Court 4 adopted the early voting schedule for the 2018 general 5 election to intentionally discriminate against young 6 voters in Waller County? 7 A. Yes. 8 Q. Okay. What are the bases for that contention? 9 A. The same ones I stated earlier, in being that 10 the students of Prairie View A&M University, as in your 11 question, young voters -- we are the young voters. We 12 are really the only young voters of Waller County, 13 considering that Waller County is a primarily older 14 resident county besides the University of Prairie View. 15 Q. Okay. Other than what you have testified to in 16 response to my first question and what you've just 17 added, are there any other bases for your belief that 18 the early voting schedule was intentionally adopt -- was 19 adopted to intentionally discriminate against younger 20 voters? 21 A. No. 22 Q. Have you ever filed any lawsuits besides this 23 one? 24 A. No, I have not. 25 Q. Okay. Have you ever been a defendant in any</p>	<p style="text-align: right;">Page 168</p> <p>1 EXAMINATION 2 BY MS. ADEN: 3 Q. Ms. Allen, I have a few questions for you. 4 A. Okay. 5 Q. Okay. Because I'm asking you questions but 6 we're still being transcribed, can you just make sure to 7 speak up? And I know you might turn to me, so -- 8 A. Okay. 9 Q. -- think about that we're still being recorded. 10 A. Yes. 11 Q. Okay. So, Ms. Allen, you testified earlier in 12 the day that you have several family members who are 13 PVAMU alum. Is that accurate? 14 A. That is correct. 15 Q. Okay. Based upon that, did you learn anything 16 about voting discrimination that they or other PVAMU 17 students have experienced while attending this school? 18 MR. SEAQUIST: Form. 19 THE WITNESS: Yes, I -- yes, I have. My 20 parents went to school in the '80's, and at that time 21 there was a series of redistricting and different lines 22 being drawn within the county that had a direct impact 23 on them in voting locations. 24 Also, my older sister was here during the 25 time where a -- where there was another march and</p>

Jayla Allen, et al. vs. Waller County Texas, et al.
 Jayla Jenice Allen - 10/11/2019

<p style="text-align: right;">Page 169</p> <p>1 another encounter of legal action that had to take place 2 considering their early -- early voting and voting was 3 being threatened within the county, again, as Prairie 4 View A&M University students. 5 Q. (BY MS. ADEN) Are you familiar with the Prairie 6 View nine? 7 A. I am. 8 Q. And is that something that you learned about 9 through your family or as through being a student at 10 Prairie View AMU? 11 A. Yes. I actually learned it through my family 12 first before I even was a student at Prairie View. My 13 sister was here during that time. 14 Q. And what is your understanding of what the 15 Prairie View nine are or meant? 16 A. That they were another group of students that 17 took legal action against the voter suppression in 18 Waller County. 19 Q. And so you're describing voting discrimination 20 that occurred in the 1980's? 21 A. The 1980's and the 1990's and in the early 22 2000's. 23 Q. And do you situate what -- the role or the work 24 that you're doing in this lawsuit to be part of that 25 history of racial discrimination in voting that Prairie</p>	<p style="text-align: right;">Page 171</p> <p>1 Q. Now, you testified also that students -- there 2 are certain students that have to be on a meal plan. Is 3 that accurate? 4 A. That is correct. 5 Q. And you testified, I think -- you said 6 something in passing like because of transportation. Is 7 that accurate? 8 A. Yes. 9 MR. SEAQUIST: Form. 10 Q. (BY MS. ADEN) What did you mean by that? 11 A. With -- with students being on -- living on 12 campus, you having a meal plan ensures that you will -- 13 you have the access to food, considering that not all 14 students -- a great majority of students don't have a 15 car or can't afford a car and don't have transportation 16 off of campus to get food anywhere else. 17 So having a meal plan ensures that you 18 have at least a couple of options on campus to ensure 19 that students are having access to eating, considering 20 that there are so many students who undergo financial 21 troubles as well as transportation means. 22 Q. Has the university done anything to ensure that 23 students can eat? 24 A. Yes. We -- due to the number of students who 25 have financial troubles and lack of access to food off</p>
<p style="text-align: right;">Page 170</p> <p>1 View students encountered? 2 MR. SEAQUIST: Form, leading. 3 THE WITNESS: Yes. I would say it's 4 continuous. 5 Q. (BY MS. ADEN) You testified about the many 6 scholarships that you receive. And your family must be 7 super proud of you. 8 Do you have any sense, based upon all of 9 the work that you described on campus that you do, of 10 what type of financial support, or not, other students 11 may receive? 12 MR. SEAQUIST: Object to the form. 13 Q. (BY MS. ADEN) You can go ahead. 14 A. Thank you. 15 A lot of students are drowning in debt to 16 even attend the university. A lot of them don't have 17 the financial means for cars or other extra activities 18 outside of paying for school. One of my closest friends 19 is \$40,000 in debt. 20 And with that being so, I mean, even as 21 the university, we have plenty of students who are 22 struggling financially. A lot of them still have 23 scholarships but don't have enough to cover the cost of 24 school let alone a vehicle or anything else outside of 25 the cost.</p>	<p style="text-align: right;">Page 172</p> <p>1 of campus or the funds to get the food off of campus, 2 we've recently opened a food pantry that is free and 3 open to all students without basically -- not in secret, 4 but also in a way that is not embarrassing to the 5 students who are in financial troubles or don't have the 6 means. And the food pantry is open to all students, so 7 therefore everyone has access to food. 8 Q. What's your understanding of public 9 transportation in Prairie View? 10 A. There is none. 11 Q. And you have personally never taken public 12 transportation in Prairie View? 13 A. No. 14 Q. Okay. You testified about your work with The 15 Panther Party including one of the buckets of community 16 engagement. Is that accurate? 17 A. That is correct. 18 Q. Can you describe briefly what type of community 19 engagement work they do or you do in conjunction with 20 The Panther Party? 21 A. Political, economic, and community development. 22 A lot of it is looking at the City of Prairie View 23 within Waller County and seeing the live -- a lot of 24 people that are living in poverty. And because of that, 25 it -- the economic development of it is to really make</p>

Jayla Allen, et al. vs. Waller County Texas, et al.
 Jayla Jenice Allen - 10/11/2019

<p style="text-align: right;">Page 173</p> <p>1 students aware and then also continuing to -- continuing</p> <p>2 to engage them within the community in ways that they</p> <p>3 can provide economic development and how they can also,</p> <p>4 as students, in -- after they graduate, within the City</p> <p>5 of Prairie View.</p> <p>6 Q. You testified that you had gotten tickets when</p> <p>7 you've parked on campus. Is that accurate?</p> <p>8 A. That is correct.</p> <p>9 Q. Okay. Do you think that getting a ticket or</p> <p>10 more on campus should be an impediment to students</p> <p>11 having early voting at the Memorial Student Center?</p> <p>12 MR. SEAQUIST: Object to the form.</p> <p>13 THE WITNESS: No.</p> <p>14 Q. (BY MS. ADEN) Why not?</p> <p>15 A. Because that is another -- that's another</p> <p>16 economic burden, first off, on students, but also</p> <p>17 discouraging.</p> <p>18 Q. What's discouraging?</p> <p>19 A. A ticket for a student anywhere, being on</p> <p>20 college -- being on a college campus and already paying</p> <p>21 for college and we're all broke college students.</p> <p>22 Q. And so say tickets were something that's</p> <p>23 possible were you to have to vote at the Memorial</p> <p>24 Student Center. Do you think that there's anything that</p> <p>25 can be done to resolve that to ensure that voting can</p>	<p style="text-align: right;">Page 175</p> <p>1 more people use the student center?</p> <p>2 MR. SEAQUIST: Object to form.</p> <p>3 THE WITNESS: Yes.</p> <p>4 Q. (BY MS. ADEN) And for what type of events? Can</p> <p>5 you describe a few?</p> <p>6 A. Anything -- political forums. The last -- one</p> <p>7 of the ones during that time frame was the Beto O'Rourke</p> <p>8 debate -- well, no, not debate, but forum. We had many</p> <p>9 come from really all within the community and it was</p> <p>10 sold out for like -- well, it wasn't sold out because we</p> <p>11 didn't have to purchase tickets, but we did have limited</p> <p>12 seating in tickets. But many people came from the</p> <p>13 community.</p> <p>14 But that's something that often happens</p> <p>15 with our center, the Student Memorial Center. Plenty of</p> <p>16 people from the campus come out, but also the community.</p> <p>17 Q. Okay. And you mentioned your work in the</p> <p>18 community of Prairie View through The Panther Party.</p> <p>19 Have you ever heard complaints from Prairie View</p> <p>20 community residents about coming to the Memorial Student</p> <p>21 Center?</p> <p>22 A. No, I never have heard a complaint.</p> <p>23 Q. Okay. Just speaking very quickly again about</p> <p>24 your Panther Party work, why -- you testified to a</p> <p>25 bucket -- the political engagement bucket of The Panther</p>
<p style="text-align: right;">Page 174</p> <p>1 continue at the Memorial Student Center?</p> <p>2 MR. SEAQUIST: Form.</p> <p>3 THE WITNESS: Yes.</p> <p>4 Q. (BY MS. ADEN) Like what?</p> <p>5 A. Well, first, a conversation with our parking</p> <p>6 management department and also being -- having access to</p> <p>7 a center or a polling location where it is in walking</p> <p>8 distance so therefore students don't have to drive.</p> <p>9 Q. Say that people off campus want to use the</p> <p>10 early voting site at the Memorial Student Center. Have</p> <p>11 you seen other public events take place at the Memorial</p> <p>12 Student Center?</p> <p>13 A. Yes, several. That's one of our most used</p> <p>14 locations for student events that involve the community</p> <p>15 as well.</p> <p>16 Q. And when you've been to those -- and you</p> <p>17 yourself have been to those types of events?</p> <p>18 A. Yes.</p> <p>19 Q. Public events?</p> <p>20 A. Several.</p> <p>21 Q. And when you've been to those events, have you</p> <p>22 seen hundreds of people use the Memorial Student Center?</p> <p>23 MR. SEAQUIST: Object to the form.</p> <p>24 THE WITNESS: Yes.</p> <p>25 Q. (BY MS. ADEN) Have you seen a thousand or so or</p>	<p style="text-align: right;">Page 176</p> <p>1 Party work. That political engagement, does that</p> <p>2 include voting?</p> <p>3 A. Yes.</p> <p>4 Q. And why is it important to your life and that</p> <p>5 of Panther Party members and other PVAM students to have</p> <p>6 access to the right to vote?</p> <p>7 MR. SEAQUIST: Form.</p> <p>8 THE WITNESS: I believe that it's</p> <p>9 important and crucial that students have a say not as</p> <p>10 just students but as residents of a county and of a city</p> <p>11 where they -- where they live and where they contribute.</p> <p>12 It's important to have accurate representation but also</p> <p>13 a say in those who are representing you, no matter where</p> <p>14 you live or how long you live there.</p> <p>15 Q. (BY MS. ADEN) And that's Federal</p> <p>16 representation?</p> <p>17 A. That's local, State, Federal. That's at every</p> <p>18 level that someone can vote in.</p> <p>19 Q. Now, you testified about your awareness of the</p> <p>20 jail bond issue during the fall 2017 election season.</p> <p>21 Is that accurate?</p> <p>22 A. That's correct.</p> <p>23 Q. What do you remember about that issue?</p> <p>24 A. It was one of the greatest issues here on our</p> <p>25 campus and within the city and the community of Prairie</p>

Jayla Allen, et al. vs. Waller County Texas, et al.
 Jayla Jenice Allen - 10/11/2019

<p style="text-align: right;">Page 177</p> <p>1 View. It was actually one of the reasons why I actually 2 got involved and became precinct chair. 3 A little bit prior to the jail bond issue 4 we had the incident of Sandra Bland. And that was a 5 direct impact to the students in seeing even on the -- 6 on the same University Drive that's now Sandra Bland 7 Parkway that you take to come into the school, we saw 8 that we needed a -- not only a direct impact on who's 9 representing us when these issues arise in the county 10 and the city that we live in, but also more incidents 11 with young people of color being arrested or having 12 police brutality within the county. 13 Q. Why does that matter -- 14 MR. SEAQUIST: Object to the 15 responsiveness. 16 Q. (BY MS. ADEN) Why does that matter to Prairie 17 View students on this campus? 18 MR. SEAQUIST: Object to the form. 19 THE WITNESS: We're a campus -- we're a 20 historically black college and university campus where 21 you have nothing but a great mix of students of color. 22 And in our time of having a great arise of police 23 brutality and a problem with community policing, a jail 24 also -- a bigger jail with housing -- being able to 25 house more people within so close of our university, I</p>	<p style="text-align: right;">Page 179</p> <p>1 finances. Is that accurate? 2 A. That is correct. 3 Q. But in your role in The Panther Party, do you 4 have a general sense of how much money the party has? 5 A. I would say that we have very little, 6 considering that the bulk of a student body organization 7 who gets no funding -- or if we do get any funding, it's 8 very limited and very little. An organization full of 9 college students, who are broke college students and 10 have no money, I would say that our finances are 11 limited. 12 MR. SEAQUIST: Object to the 13 responsiveness. 14 Q. (BY MS. ADEN) You testified about the charter 15 bus on October 26. Do you recall that? 16 A. Yes. 17 Q. Okay. And you mentioned that the PVAMU 18 president was affiliated with getting that bus; is that 19 correct? 20 A. That's correct. 21 Q. And that's Ms. Simmons, Dr. Simmons. 22 A. Yes. 23 Q. Okay. Even though she was involved in getting 24 the bus and you were adamant that she paid for it 25 personally --</p>
<p style="text-align: right;">Page 178</p> <p>1 would say that it's crucial that we had a say in that as 2 well. 3 Q. (BY MS. ADEN) I'm going to change to another 4 subject briefly, which is your testimony about the 5 addressing issue. 6 You testified that it was resolved for the 7 2018 general election. Is that accurate? 8 A. Correct. 9 Q. Do you know whether that -- the resolution is 10 considered a permanent resolution? 11 A. No, it is not. And Mr. Jackson, along with 12 Xante Wallace -- Councilman Xante Wallace and Councilman 13 Kendric Jones is a -- that's an ongoing problem that is 14 still trying to be resolved. That was a momentarily 15 solution that came down from the Secretary of State 16 after us bringing it up once again. 17 Q. So you expect it to happen in future elections? 18 MR. SEAQUIST: Form. 19 THE WITNESS: I hope so, yes. 20 Q. (BY MS. ADEN) You hope or you expect? 21 A. I expect. 22 MR. SEAQUIST: Form. 23 Q. (BY MS. ADEN) You testified that -- again, back 24 to some of your work with The Panther Party, that you're 25 not necessarily responsible for The Panther Party's</p>	<p style="text-align: right;">Page 180</p> <p>1 A. That is correct. 2 Q. -- was -- did you still associate The Panther 3 Party with the efforts to get students to know about the 4 bus, get on the bus, and take it to vote? 5 MR. SEAQUIST: Form. 6 THE WITNESS: Yes, that is correct. From 7 my understanding, there were several students who 8 actually were present while the time frames of them 9 going and getting on the bus and coming back and forth. 10 But also before, they were one of the ones that leaded 11 in the efforts to organizing getting on the bus. 12 Q. (BY MS. ADEN) Panther Party members. 13 A. That is correct. 14 Q. You testified about your work around the fall 15 2018 election season organizing transportation and other 16 issues to ensure that students could vote. Is that 17 accurate? 18 A. That is correct. 19 Q. Okay. In organizing students' access to 20 voting, did you interact with any volunteers? 21 A. Yes. There were -- there were different -- 22 excuse me. There were different volunteers from within 23 the County of Waller, the City of Prairie View, but also 24 some as far as Houston who were able to donate their 25 time to come and transport students.</p>

Jayla Allen, et al. vs. Waller County Texas, et al.
 Jayla Jenice Allen - 10/11/2019

<p style="text-align: right;">Page 181</p> <p>1 Q. What do you think about the fact that you 2 needed volunteers -- you and the other PVAM students 3 needed volunteers to be able to vote during the fall of 4 2018 election? What's your opinion about that? 5 MR. SEAQUIST: Object to the form. 6 THE WITNESS: Well, first, the opinion and 7 the fact is if we had multiple days, more days, of early 8 voting on campus, we wouldn't have needed that. But 9 it's almost -- it's almost a little embarrassing and 10 also it's a little slap in the face that we even had to 11 take out our own time, but also to gain the support of 12 other communities as far as Harris County and the City 13 of Houston to come and take students to vote off of 14 campus. 15 Q. (BY MS. ADEN) And back to the bus that took 16 students off to vote on October 26th, that was the 17 Friday of the first week of early voting. Is that 18 accurate? 19 A. That is correct. 20 Q. Okay. Why would students want to vote during 21 the first week of early voting? 22 MR. SEAQUIST: Object to the form. 23 THE WITNESS: Well, it's -- first off, 24 it's a midterm election. It's one of -- I mean, we see 25 everyone voting within the nation, not even just the</p>	<p style="text-align: right;">Page 183</p> <p>1 MR. SEAQUIST: Form. 2 THE WITNESS: Yes, that it limits the 3 students back to back if you have only a certain -- you 4 only have a certain amount of days; but also, with it 5 being so close together, it limits the students -- the 6 time frame of them being able to go and vote. It limits 7 their access as well. 8 Q. (BY MS. ADEN) You testified to your work as a 9 Democratic party precinct chair. Is that -- or a -- 10 what's the position? A -- a deputy -- a Democratic 11 deputy registrar. Is that correct? 12 A. Registrar, yes. 13 MR. SEAQUIST: Form. 14 THE WITNESS: That is correct. 15 Q. (BY MS. ADEN) In that role, did anyone from -- 16 did any of the -- any county officials ever reach out to 17 you affirmatively about the 2018 early voting schedule? 18 A. No. 19 Q. Does that include any member of the 20 Commissioners Court? 21 A. That is correct. 22 Q. And that includes Ms. Eason. 23 A. That is correct. 24 Q. And you interact with Ms. Eason in your 25 capacity as a deputy voter registrar. Is that accurate?</p>
<p style="text-align: right;">Page 182</p> <p>1 state and our county but within the nation. And being 2 able to vote early, I mean, it's -- other times, whether 3 you have schedule conflicts or time conflicts, it 4 ensures you that you will be able to cast your ballot 5 within a time before maybe any other problems or 6 conflicts occur. 7 Q. (BY MS. ADEN) You testified -- well, to that, 8 is there something about voting back to back -- over 9 back-to-back days on campus that could make it difficult 10 for students to vote? 11 MR. SEAQUIST: Object to the form. 12 MS. ADEN: Strike that. I'm going to ask 13 it another way. 14 Q. (BY MS. ADEN) So you're aware -- you testified 15 to advertising to other students the on-campus and other 16 voting opportunities during the fall 2018 election 17 season. 18 A. That is correct. 19 Q. And those included the three days that were on 20 campus Monday through Wednesday during the second week. 21 A. That is correct. 22 Q. Despite there being those days of early voting 23 on campus, is there something about having three 24 back-to-back days on campus that could make it difficult 25 for students to participate even in those?</p>	<p style="text-align: right;">Page 184</p> <p>1 A. That is correct. 2 MR. SEAQUIST: Form. 3 Q. (BY MS. ADEN) Prior to -- I think you testified 4 to -- a week before the October 17th meeting, had you 5 ever seen the early voting schedule in writing? 6 A. No. 7 Q. And that's even though you were in the Prairie 8 View area in the summer of 2018? 9 A. That is correct. 10 Q. And that includes you didn't see a schedule in 11 August of 2018? 12 MR. SEAQUIST: Leading. 13 THE WITNESS: That also is correct. 14 Q. (BY MS. ADEN) And did you see a schedule in 15 September of 2018? 16 A. No. 17 Q. Have you ever seen a member of the 18 Commissioners Court come onto campus? 19 A. No. 20 Q. Have you ever seen a chair of the Republican 21 party come on campus? 22 A. No. 23 Q. And you testified to knowing that David Luther 24 is the current chair of the Republican party. 25 A. That is correct.</p>

Jayla Allen, et al. vs. Waller County Texas, et al.
 Jayla Jenice Allen - 10/11/2019

<p style="text-align: right;">Page 185</p> <p>1 Q. And you've seen him before.</p> <p>2 A. No, I have not.</p> <p>3 Q. Did anyone ever tell you, whether in your role</p> <p>4 as the voter -- deputy voter registrar, that it was your</p> <p>5 job to be the liaison between Prairie View students and</p> <p>6 the Commissioners Court?</p> <p>7 A. No.</p> <p>8 Q. That it was your job to be the liaison between</p> <p>9 Prairie View students and the Commissioners Court with</p> <p>10 respect to the early voting schedule?</p> <p>11 A. No.</p> <p>12 Q. You testified to receiving a text from -- a</p> <p>13 group text from Ms. Rosa Harris and you believe it went</p> <p>14 to other Democratic club members. Is that accurate?</p> <p>15 MR. SEAQUIST: Form.</p> <p>16 THE WITNESS: That's correct.</p> <p>17 Q. (BY MS. ADEN) And you testified that you would</p> <p>18 have known who some of the people receiving the texts</p> <p>19 were because their -- strike that.</p> <p>20 How would you know whether you -- how</p> <p>21 would you know specifically who would have received that</p> <p>22 text?</p> <p>23 A. With having their number.</p> <p>24 Q. Meaning that their number would be saved in</p> <p>25 your phone and so their name would then pop up on your</p>	<p style="text-align: right;">Page 187</p> <p>1 Since being a student at Prairie View in</p> <p>2 2017, has anyone from the county government ever</p> <p>3 explained to you the process for setting the early</p> <p>4 voting schedule?</p> <p>5 A. No.</p> <p>6 Q. Have you ever seen that in writing since being</p> <p>7 a student at Prairie View?</p> <p>8 A. No, I have not.</p> <p>9 Q. Since becoming a Democratic party chair in</p> <p>10 2018 --</p> <p>11 A. That is correct.</p> <p>12 Q. -- has anyone ever explained to you the process</p> <p>13 for setting the early voting schedule for elections?</p> <p>14 A. No, they have not.</p> <p>15 Q. Has anyone -- have you ever seen a policy</p> <p>16 setting the process for setting the early voting</p> <p>17 schedule?</p> <p>18 MR. SEAQUIST: Leading.</p> <p>19 THE WITNESS: No, I have not.</p> <p>20 Q. (BY MS. ADEN) You testified about your role as</p> <p>21 the Democratic precinct chair for 309. In keeping with</p> <p>22 that line of discussion, do you know whether all Prairie</p> <p>23 View AMU students consider themselves to be affiliated</p> <p>24 with the Democratic party?</p> <p>25 MR. SEAQUIST: Object to form.</p>
<p style="text-align: right;">Page 186</p> <p>1 phone?</p> <p>2 A. That is correct.</p> <p>3 Q. Okay. And as far as you recall, you don't</p> <p>4 ever -- you don't remember someone like Joshua Muhammad</p> <p>5 receiving that text.</p> <p>6 A. No.</p> <p>7 Q. Or Mr. Frank Jackson.</p> <p>8 A. No.</p> <p>9 Q. And just to be clear about your role as the</p> <p>10 Democratic precinct chair, you testified to having</p> <p>11 conversations on several occasions with Ms. Rosa Harris.</p> <p>12 Is that accurate?</p> <p>13 A. That is correct.</p> <p>14 Q. And those are conversations between August and</p> <p>15 November 2018.</p> <p>16 A. That is correct.</p> <p>17 Q. And during any of those conversations did</p> <p>18 Ms. Harris ever ask you for your opinion about setting</p> <p>19 the early voting schedule for the 2018 election?</p> <p>20 A. No, she did not.</p> <p>21 Q. And that would be true of the Republican party</p> <p>22 chair?</p> <p>23 A. That is correct.</p> <p>24 Q. Did anyone ever tell you what the process</p> <p>25 was -- strike that.</p>	<p style="text-align: right;">Page 188</p> <p>1 THE WITNESS: No.</p> <p>2 Q. (BY MS. ADEN) No, you know them to be; no, you</p> <p>3 do not know them to be?</p> <p>4 A. No, I do not know them to be.</p> <p>5 Q. Affiliated with the --</p> <p>6 A. Affiliated with the Democratic party.</p> <p>7 Q. Okay. Just to make that clear, do you know</p> <p>8 whether all PVAM students affiliate themselves with the</p> <p>9 Democratic party?</p> <p>10 MR. SEAQUIST: Object to the form.</p> <p>11 THE WITNESS: No, all of them don't.</p> <p>12 Q. (BY MS. ADEN) And how do you know that?</p> <p>13 A. Because of conversations with them.</p> <p>14 Q. You testified to being at the October 17th</p> <p>15 Commissioners Court meeting?</p> <p>16 A. That is correct.</p> <p>17 Q. And I do recognize that you testified that you</p> <p>18 had to leave early. Is that accurate?</p> <p>19 A. That is correct.</p> <p>20 Q. And you had to leave early because you had to</p> <p>21 go back to class.</p> <p>22 A. That is correct.</p> <p>23 Q. And you testified that the class was in the</p> <p>24 afternoon? Is that accurate?</p> <p>25 A. That is correct.</p>

Jayla Allen, et al. vs. Waller County Texas, et al.
 Jayla Jenice Allen - 10/11/2019

<p style="text-align: right;">Page 189</p> <p>1 Q. So what time was the Commissioners Court 2 meeting? 3 A. In the morning, within the morning. 4 Q. What's your opinion about how accessible having 5 a Commissioners Court meeting in the morning would be to 6 other Prairie View AMU students? 7 MR. SEAQUIST: Form. 8 THE WITNESS: Well, of course, it's 9 limited because of transportation means of students 10 being able to get there. But also it's not really at a 11 time that a lot of students can go because of classes. 12 Q. (BY MS. ADEN) And during the time that you were 13 present at the October 17th Commissioners Court meeting, 14 was there testimony related to early voting? 15 A. Yes. 16 Q. Do you recall whether there was testimony from 17 members of the public about why they wanted early 18 voting? 19 A. Yes. 20 Q. Do you remember generally what some of the 21 reasons for -- what that testimony encompassed? 22 MR. SEAQUIST: Form. 23 THE WITNESS: Access, multiple days and 24 opportunities for them to be able to vote at different 25 times due to their schedules or conflicts that they</p>	<p style="text-align: right;">Page 191</p> <p>1 THE WITNESS: First, it was a slap in the 2 face, considering that, as students, we were already 3 denied the fact of them sharing the information or the 4 process of us picking or having a say or even a notice 5 in the number of days that we were given to vote on our 6 own campus. But once we become -- once we came before 7 them and stated the issue and a resolution to fixing the 8 problem, they denied it. And then after us joining a 9 lawsuit, then magically we were granted more days. 10 That's a -- that's more so of a slap in 11 the face to have student leaders who not only want to 12 vote and to have early voting but to have students on 13 this campus that want to vote and for them to deny it -- 14 once we came before them in a way that was respectful 15 and with a sincere -- with us going before them and 16 asking them in a way that was -- in my opinion, it was 17 in a way that was most sincere and with the best 18 interest not at -- of us, but of the whole campus and 19 the entire student body, and for them to deny it and 20 then to go back and add the days, it shows, for one, 21 that it was possible for them to do it the week before 22 and for them to add the days and that they didn't want 23 to and more so of they -- it shows that, in the history, 24 that they've done things where they have had the ability 25 to change it and they haven't.</p>
<p style="text-align: right;">Page 190</p> <p>1 might have had during the days that were given. 2 Q. (BY MS. ADEN) And just to be clear, this is 3 testimony urging on-campus early voting for the fall 4 2018 election. 5 MR. SEAQUIST: Leading. 6 THE WITNESS: That is correct. 7 Q. (BY MS. ADEN) Do you recall hearing 8 Commissioner Court -- Commissioners Court members 9 proposing additional early voting days? 10 A. No. 11 Q. Do you recall hearing reasons why the 12 Commissioners Court would not add or change the early 13 voting schedule? 14 A. Directly? It was too late, they stated, and 15 that they couldn't go back and change things, although 16 they did later on after -- after we did Commissioners 17 Court and us taking on the challenge of getting more 18 days within the lawsuit. But before then, they would 19 not afford us more days and -- yeah. 20 Q. So what did you think about the fact that they 21 said or that you heard them say that they couldn't add 22 more days and then the fact that they ultimately seemed 23 to be able to change the schedule after this lawsuit? 24 What did you think about that? 25 MR. SEAQUIST: Object to the form.</p>	<p style="text-align: right;">Page 192</p> <p>1 MR. SEAQUIST: Object to the 2 responsiveness. 3 Q. (BY MS. ADEN) And when you said that they added 4 days, none of those days were added to days on campus at 5 the Memorial Student Center. 6 MR. SEAQUIST: Form. 7 THE WITNESS: That is correct. 8 Q. (BY MS. ADEN) During that Commissioners Court 9 meeting did you ever hear anyone raise an issue about 10 the security -- the purported security of voting at the 11 Memorial Student Center? 12 A. No. 13 Q. What do you think about whether or not the -- 14 well, strike that. 15 You testified -- I mean, you've been 16 testifying at length about the 2018 early voting 17 schedule. Do you have an opinion about whether Prairie 18 View A&MU students use early voting more than voting on 19 election day? 20 MR. SEAQUIST: Object to the form. 21 THE WITNESS: Yes. A lot of the people I 22 know and the students that I engage in partake in early 23 voting; and for those of them who might not have, it 24 also gives them the opportunity to take in -- to be able 25 to go vote on the days before election day.</p>

Jayla Allen, et al. vs. Waller County Texas, et al.
 Jayla Jenice Allen - 10/11/2019

<p style="text-align: right;">Page 193</p> <p>1 Q. (BY MS. ADEN) You also testified to your 2 awareness generally that there were a good amount of 3 machines provided at the Memorial Student Center during 4 the early voting season. Is that accurate? 5 A. That is correct. 6 Q. Did you -- do you have an opinion about why 7 that amount of machines was provided by the County to 8 the student center? 9 MR. SEAQUIST: Form. 10 THE WITNESS: For -- yes, due to the 11 amount of people, residents, that were voting in that 12 specific precinct. With having an overwhelming amount 13 of students that are residents of the county being able 14 to -- or that being their polling location to vote, it 15 all -- it just makes sense for us to have more, 16 considering the -- the polls were being for more of a 17 population, a bigger population. 18 Q. (BY MS. ADEN) So more machines, more 19 expectation that there's going to be voters there. 20 MR. SEAQUIST: Object to leading, form. 21 THE WITNESS: Correct. 22 Q. (BY MS. ADEN) Including voters who may come 23 from off of the Prairie View campus? 24 MR. SEAQUIST: Object to leading, form. 25 THE WITNESS: That is correct.</p>	<p style="text-align: right;">Page 195</p> <p>1 Q. I'm getting to the end. And I apologize for 2 skipping around. 3 So back to the Commissioners Court meeting 4 on October 17th, you talked about some of the things 5 that you heard while you were at the meeting. Did 6 you -- do you recall hearing any students or any members 7 of the public talk about voting at the Waller County 8 Community Center? 9 A. No. 10 Q. Okay. And you testified that you yourself have 11 not been to the Waller County Community Center. 12 A. That is correct. 13 Q. Are you aware of whether other PVAMU students 14 use the Waller County Community Center? 15 A. No. 16 Q. Are you aware of how many students use the post 17 office? 18 A. No. 19 Q. Do you have an opinion about whether in this 20 modern age students tend to go to the post office? 21 MR. SEAQUIST: Form. 22 THE WITNESS: Very few. 23 Q. (BY MS. ADEN) Mailing letters or packages, is 24 that a common activity for you or other students? 25 MR. SEAQUIST: Form.</p>
<p style="text-align: right;">Page 194</p> <p>1 Q. (BY MS. ADEN) I'm skipping around a little bit 2 and I apologize. But you testified to your work 3 organizing and taking at least one person to vote off 4 campus during the 2018 early voting schedule. Is that 5 accurate? 6 A. That is correct. 7 Q. Okay. When you were organizing and taking 8 someone off the campus to vote, were you telling them 9 who to vote for? 10 A. No. 11 Q. Were you telling them to vote for a Democratic 12 party affiliated candidate? 13 A. No. 14 Q. Were you telling them to vote for a Republican 15 party affiliated candidate? 16 A. No. 17 Q. Did you care how they voted? 18 A. No. 19 Q. Why did you want them to vote? 20 A. For one, I wanted them to vote because that is 21 a direct impact on those who represent us. So how we 22 use our vote -- our voice, wherever we live, is a direct 23 impact in voting. And also it gives them the 24 opportunity to see who represents them, who -- who has 25 their interest at heart.</p>	<p style="text-align: right;">Page 196</p> <p>1 THE WITNESS: No. 2 Q. (BY MS. ADEN) Okay. When students want to 3 communicate with their parents, how do they communicate 4 with them? 5 MR. SEAQUIST: Object to the form. 6 THE WITNESS: They text them -- 7 Q. (BY MS. ADEN) Or do they -- 8 A. -- or call them. 9 Q. How often would you guess a student mails a 10 letter or package from the post office? 11 MR. SEAQUIST: Object to the form. 12 THE WITNESS: Very rare. 13 Q. (BY MS. ADEN) And over your -- since being on 14 campus since 2017, tell me, how many times have you been 15 to the post office? 16 A. Once or twice. 17 Q. How many times have you been to the Memorial 18 Student Center? 19 A. Oh, gosh. Hundreds, thousands of times. 20 Q. And is that -- excuse me. 21 A. That's a central location on campus. So you go 22 there to eat. You go there for meetings. You go there 23 to socialize. You go there to purchase things like your 24 books from the bookstore. You go there for the student 25 engagement office. You go there for the Student</p>

Jayla Allen, et al. vs. Waller County Texas, et al.
Jayla Jenice Allen - 10/11/2019

<p style="text-align: right;">Page 197</p> <p>1 Government Association office. You go there to purchase 2 personal items. You go there to get your ID. If you 3 have any problems with your accounts, that's where you 4 would go. It's a central location for a number of 5 things for all students who live on campus. 6 MR. SEAQUIST: Object to the 7 responsiveness. 8 Q. (BY MS. ADEN) I'm going to turn your attention 9 back to Exhibit 6 with Mister -- which Mr. Seaquist 10 showed you. It's a Google map of the Waller County 11 Community Center. 12 You testified that there may -- you 13 testified, I believe, that there was a sidewalk that 14 might run between the Hobart -- from the Hobart Taylor 15 Hall or near it beside the parking lot? 16 A. Yes. 17 Q. Have you, in fact, seen that sidewalk before? 18 A. No, I have not. 19 Q. Have you driven by the Waller County post 20 office -- or I'm sorry. Strike that. 21 Have you driven by the community center 22 and the post office? 23 A. I have. 24 Q. And are you aware whether there's a sidewalk 25 that runs in front of them?</p>	<p style="text-align: right;">Page 199</p> <p>1 Q. Okay. Strike that. Or not strike that, but -- 2 yes. Okay. 3 You testified earlier that -- well, 4 correct me if I'm wrong. Did you testify earlier to -- 5 strike that. 6 You testified earlier that you walk on 7 campus. 8 A. That is correct. 9 Q. Do you tend to walk on sidewalks when you walk 10 on campus? 11 A. Yes. We don't walk on the grass here, so -- 12 Q. Why don't -- 13 MR. SEAQUIST: Object to the 14 responsiveness. 15 THE WITNESS: Yes, I walk on the 16 sidewalks. We don't walk on the grass here. 17 MR. SEAQUIST: Object to the 18 responsiveness. 19 Q. (BY MS. ADEN) Why do you not walk on the grass? 20 MR. SEAQUIST: Object to the form. 21 THE WITNESS: We don't walk on the grass 22 at Prairie View because of the history of Prairie View. 23 Prairie View, before it was a college campus, it's -- it 24 was an old plantation. So out of respect for our 25 ancestors and it being a plantation, we don't walk on</p>
<p style="text-align: right;">Page 198</p> <p>1 A. There isn't. It's -- the post office and the 2 center sits off of State Loop 1098; so therefore, it is 3 a street and a -- well, a highway actually. There is no 4 sidewalk. 5 MR. SEAQUIST: Object to the 6 responsiveness. 7 Q. (BY MS. ADEN) And looking at the map, does it 8 reflect that the Waller County Community Center -- 9 strike that. 10 Looking at Exhibit 6, is there a red 11 bubble to the right of the United States Postal Service? 12 A. That is correct. 13 Q. And does it indicate that that's where the 14 Waller County Community Center is? 15 A. That is correct. 16 Q. And is that, in fact, where the Waller County 17 Community Center is? 18 A. No, it is not. 19 Q. Looking at this exhibit, there is a parking lot 20 between the Hobart Taylor Hall and the post office. Is 21 that accurate? 22 A. That is correct. 23 Q. Are you aware of whether -- have you ever 24 walked in that parking lot? 25 A. No, I have not.</p>	<p style="text-align: right;">Page 200</p> <p>1 the grass. It's sacred. 2 Q. (BY MS. ADEN) So if students were asked to walk 3 on grass to go vote, how would you feel about that? 4 MR. SEAQUIST: Form. 5 THE WITNESS: That's -- that's beyond 6 disrespectful, considering that, for one, we are a 7 historically black college and university filled with 8 minority students that sits on an old plantation where 9 many of our ancestors didn't have any rights, let alone 10 a right to vote. And for us to go and walk on it to go 11 vote is beyond disrespectful and insulting to us as 12 students and as people of color. 13 Q. (BY MS. ADEN) Now, looking back at Exhibit 6, 14 how would you feel were you asked to go from the Hobart 15 Taylor Hall and walk through the parking lot to then 16 access the community center? 17 MR. SEAQUIST: Form. 18 Q. (BY MS. ADEN) How would you feel if that was 19 the path that you were required to take to get to a 20 voting site were one not provided on campus? 21 MR. SEAQUIST: Object to the form. 22 THE WITNESS: For one, that's a safety 23 hazard. It's a parking lot. People are parking their 24 cars. They're driving in and out of it. And you're 25 asking hundreds -- thousands of students to walk through</p>

Jayla Allen, et al. vs. Waller County Texas, et al.
 Jayla Jenice Allen - 10/11/2019

Page 201	Page 203
<p>1 it to get to a center to vote when there is somewhere 2 closer for them to vote. 3 Q. (BY MS. ADEN) And based upon this map, there 4 doesn't appear to be a sidewalk that would take them 5 from Hobart Taylor Hall, across the parking lot, and 6 then to either the post office or the community center. 7 MR. SEAQUIST: Object to the form. 8 THE WITNESS: That is correct. 9 Q. (BY MS. ADEN) You testified earlier that you 10 can't think of another area in Waller County where 11 voters could vote where they live. Is that accurate? 12 A. That is correct. 13 Q. What makes that necessary for Prairie View 14 students? 15 MR. SEAQUIST: Object to the form. 16 THE WITNESS: Considering this is where we 17 live and that multiple students don't have access to 18 transportation and/or cars to travel anywhere to go and 19 vote. 20 Q. (BY MS. ADEN) You testified that you were 21 handing out waters during the Parade of Voters. Do you 22 recall that? 23 A. That is correct. 24 Q. Why were you doing that? 25 A. Because it's hot and we were sweating and</p>	<p>1 you're here today because we filed a lawsuit and you're 2 a plaintiff. Is that accurate? 3 A. That is correct. 4 Q. Why did you feel the need to file a lawsuit? 5 A. I don't see a reason why I wouldn't have joined 6 the lawsuit, considering that it was a chance for me to 7 further my activism in getting students on campus 8 engaged in fighting for our rights on campus, but also 9 in this nation. 10 So joining the lawsuit gave me the 11 opportunity to stand up and to speak out on the 12 injustices that are going on, but also on this campus 13 and in this town, that has been going on for decades. 14 Q. And how does it make you feel as a Prairie View 15 student and resident of Waller County that the County is 16 expending your tax dollars -- strike that. 17 How do you feel as a Prairie View student 18 and a resident of Waller County that the City -- that 19 the County is defending -- strike that. 20 How does it make you feel as a student of 21 Prairie View and a resident of Waller County that the 22 county officials are defending this lawsuit and standing 23 in the way of your having on-campus early voting? 24 MR. SEAQUIST: Form and leading. 25 THE WITNESS: I feel as though it is</p>
Page 202	Page 204
<p>1 having to walk an excessive amount around the campus. 2 Q. And you considered the parade route to be 3 excessive walking? 4 A. Yes. Many students, if not all students, would 5 not walk that amount every day to get to and from their 6 everyday buildings. 7 MR. SEAQUIST: Object to the 8 responsiveness. 9 Q. (BY MS. ADEN) You testified that you have plans 10 to be a lawyer. Is that accurate? 11 A. That is correct. 12 Q. What type of lawyer? 13 A. Civil rights. 14 Q. How come? 15 A. Well, for one, I knew I wanted to get involved 16 in law; but for two, doing work such as this and seeing 17 the need and the -- and my desire to bring forth change 18 to my communities and for those who look like me and to 19 fight for the injustices that are happening every day in 20 this country and that have for decades and centuries for 21 those that look like me. 22 Q. Are there non-black students who attend Prairie 23 View? 24 A. Oh, yeah, there's plenty. Yes, there's plenty. 25 Q. Why did you think -- you testified -- I mean,</p>	<p>1 excluding us, as it always has, as students and also as 2 residents of this county. We spend money here. We're 3 paying to go to college. So we pay taxes, yet we are 4 being excluded in those who represent us and being able 5 to elect those who represent us. 6 And although there aren't -- although we 7 were given days to vote, it's limiting our access to 8 being able to vote and having a number of days as though 9 the rest of the county is getting as well. 10 MR. SEAQUIST: Object to the 11 responsiveness. 12 Q. (BY MS. ADEN) And do you think that county 13 officials could be doing more for Prairie View students? 14 A. I believe they could do a lot more, not just in 15 granting us a fair amount -- an equal amount of days of 16 early voting or voting. But the relationship between 17 the County is nonexistent. We don't see them. We don't 18 have a -- we don't have conversations with them. We 19 have no engagement within the county officials, 20 Democratic or Republican. They don't come on campus. 21 We have no direct communication with them. We have no 22 direct representation of them at all. 23 Q. And that includes even in your capacity as a 24 party precinct chair? 25 A. That is correct.</p>

Jayla Allen, et al. vs. Waller County Texas, et al.
 Jayla Jenice Allen - 10/11/2019

Page 205	Page 207
<p>1 MR. SEAQUIST: Leading.</p> <p>2 Q. (BY MS. ADEN) And does that include -- when</p> <p>3 you're talking about county officials, does that include</p> <p>4 Commissioner Barnett?</p> <p>5 A. That is correct.</p> <p>6 Q. And even though he represents Precinct 3 which</p> <p>7 includes Prairie View University.</p> <p>8 A. That is correct.</p> <p>9 MS. ADEN: Can we take less than one</p> <p>10 minute to just make sure we have nothing else?</p> <p>11 MR. SEAQUIST: You may.</p> <p>12 (Recess from 2:50 p.m. to 2:53 p.m.)</p> <p>13 MS. ADEN: Plaintiffs do -- well, strike</p> <p>14 that.</p> <p>15 I don't have any more questions.</p> <p>16 EXAMINATION</p> <p>17 BY MR. SEAQUIST:</p> <p>18 Q. Okay. Let me ask you a few questions.</p> <p>19 You had testified earlier about your</p> <p>20 objections to walking on the grass on campus.</p> <p>21 A. That is correct.</p> <p>22 Q. Is that limited to grass on campus?</p> <p>23 A. That's all the grass with -- I'm sorry. That's</p> <p>24 all grass on campus.</p> <p>25 Q. Okay. But I guess my question is: Is it your</p>	<p>1 university administration in terms of voting locations?</p> <p>2 A. I know of one.</p> <p>3 Q. What one do you know of?</p> <p>4 A. The one that happened most recently.</p> <p>5 Q. Okay. And do you know whether there could have</p> <p>6 been more than that that you're unaware of?</p> <p>7 A. There could have been.</p> <p>8 Q. Okay. We've talked a little bit about deputy</p> <p>9 voting training -- or deputy voting registrar training;</p> <p>10 is that right?</p> <p>11 A. That is correct.</p> <p>12 Q. Christy Eason performs that training?</p> <p>13 A. Yes, for the most part.</p> <p>14 Q. And she comes to campus to train on how to</p> <p>15 become a deputy registrar?</p> <p>16 A. That is correct.</p> <p>17 Q. Do you know how many times she's done that this</p> <p>18 year already?</p> <p>19 A. A couple.</p> <p>20 Q. Okay. Did she do that in the 2018 year or in</p> <p>21 the fall of 2018?</p> <p>22 A. Yes. Well, I'm -- I believe so, yes.</p> <p>23 Q. Okay. You understand that the Commissioner</p> <p>24 Court meetings of Waller County are open to the public?</p> <p>25 A. Yes.</p>
Page 206	Page 208
<p>1 position just in your day-to-day life that you won't</p> <p>2 walk on grass anywhere or is that just on the university</p> <p>3 campus?</p> <p>4 A. The university.</p> <p>5 Q. Okay. You had testified about the relationship</p> <p>6 between the university and the County.</p> <p>7 A. Yes.</p> <p>8 Q. Are you aware of the ongoing discussions that</p> <p>9 have taken place in regard to the registration issue</p> <p>10 between officials of the county and officials of the</p> <p>11 university?</p> <p>12 A. I am aware of one meeting.</p> <p>13 Q. Okay. Could there be other meetings that you</p> <p>14 don't know about?</p> <p>15 A. I highly doubt it. Considering just as though</p> <p>16 there was that one and I heard of it, I would have had</p> <p>17 the opportunity to hear of the others if they were ever</p> <p>18 present.</p> <p>19 Q. Well, you said -- you said you highly doubt it,</p> <p>20 just as though there was that one. My question is: If</p> <p>21 the -- the County and the university could be having</p> <p>22 meetings without you being aware of it, correct?</p> <p>23 A. They could.</p> <p>24 Q. Okay. And are you aware of ongoing discussions</p> <p>25 that have been taking place between the County and the</p>	<p>1 MR. SEAQUIST: And that's all I have.</p> <p>2 Thank you.</p> <p>3 MS. ADEN: I have re-redirect.</p> <p>4 MR. SEAQUIST: Okay.</p> <p>5 EXAMINATION</p> <p>6 BY MS. ADEN:</p> <p>7 Q. We've been talking about grass.</p> <p>8 A. Yes.</p> <p>9 Q. Okay. When you go to Houston, do you walk on</p> <p>10 grass?</p> <p>11 A. Yes.</p> <p>12 Q. Is there -- why is walking on grass at this</p> <p>13 particular university significant to you?</p> <p>14 MR. SEAQUIST: Object to the form.</p> <p>15 THE WITNESS: Because of the history and</p> <p>16 the respect and it being sacred to us students of color</p> <p>17 on a historically black college and university and of</p> <p>18 our ancestors who were once on this old plantation.</p> <p>19 Q. (BY MS. ADEN) And are you knowingly walking on</p> <p>20 grass where enslaved people could be buried in some</p> <p>21 other part of the country, including Houston?</p> <p>22 MR. SEAQUIST: Object to the form.</p> <p>23 THE WITNESS: That is correct.</p> <p>24 Q. (BY MS. ADEN) You are knowingly or you are not</p> <p>25 knowingly?</p>

Jayla Allen, et al. vs. Waller County Texas, et al.
 Jayla Jenice Allen - 10/11/2019

Page 209	Page 211
<p>1 MR. SEAQUIST: Form.</p> <p>2 THE WITNESS: Not knowingly.</p> <p>3 Q. (BY MS. ADEN) And are you aware of whether or</p> <p>4 not the land that was once a plantation where people are</p> <p>5 enslaved -- does that end at the boundaries of this</p> <p>6 campus?</p> <p>7 A. That is correct.</p> <p>8 Q. It does or does not end there?</p> <p>9 A. It does.</p> <p>10 Q. It does end at the boundaries of this campus?</p> <p>11 A. Yes.</p> <p>12 Q. So are you aware whether or not there were</p> <p>13 other plantations in Waller County outside of the</p> <p>14 plantation that may not have been -- or strike that.</p> <p>15 Are you aware of whether or not there are</p> <p>16 plantations that -- strike that.</p> <p>17 Do you know for sure whether or not the --</p> <p>18 a former plan -- strike that.</p> <p>19 Do you know whether or not the Waller</p> <p>20 County Community Center is housed on top of grounds that</p> <p>21 could have been a former slave plantation?</p> <p>22 MR. SEAQUIST: Form.</p> <p>23 THE WITNESS: Yes, that's correct.</p> <p>24 Q. (BY MS. ADEN) That it could?</p> <p>25 A. That it could.</p>	<p>1 Q. And did -- was voting a topic of that</p> <p>2 conversation?</p> <p>3 A. That is correct.</p> <p>4 Q. And what's your understanding about what was</p> <p>5 discussed?</p> <p>6 A. The new legislation piece on early voting, but</p> <p>7 also the voting centers that are trying to be</p> <p>8 established.</p> <p>9 Q. And what's your understanding about that issue?</p> <p>10 A. That it places voting at the center, at the --</p> <p>11 at the Waller County Community Center.</p> <p>12 Q. And what's your reaction to a proposal that</p> <p>13 would create -- strike that.</p> <p>14 Are there any other locations beyond the</p> <p>15 Waller County Community Center that are being proposed,</p> <p>16 suggested for future early voting locations?</p> <p>17 MR. SEAQUIST: Object to the form.</p> <p>18 THE WITNESS: I do believe so.</p> <p>19 Q. (BY MS. ADEN) In Waller County?</p> <p>20 A. Yes.</p> <p>21 Q. In Prairie View.</p> <p>22 A. Yes.</p> <p>23 Q. Okay. What's -- which ones are those?</p> <p>24 A. If I remember correctly, it's city hall and --</p> <p>25 no. Just city hall, I believe, and the courthouse.</p>
Page 210	Page 212
<p>1 MR. SEAQUIST: Form.</p> <p>2 Q. (BY MS. ADEN) Please explain what you're trying</p> <p>3 to say, that it could --</p> <p>4 A. That it --</p> <p>5 MR. SEAQUIST: I'm going to object to the</p> <p>6 form.</p> <p>7 Go ahead.</p> <p>8 THE WITNESS: That the -- the center could</p> <p>9 be part of the old plantation, the formal plantation --</p> <p>10 former. Excuse me.</p> <p>11 Q. (BY MS. ADEN) You talked about the recent</p> <p>12 meeting related to the new legislation regarding early</p> <p>13 voting. Is that accurate?</p> <p>14 MR. SEAQUIST: Object to form.</p> <p>15 THE WITNESS: That is correct.</p> <p>16 Q. (BY MS. ADEN) And what is your understanding of</p> <p>17 the new legislation?</p> <p>18 A. That -- can you reask that question?</p> <p>19 Q. What is your understanding of the new -- strike</p> <p>20 that.</p> <p>21 You testified to being at a recent meeting</p> <p>22 where -- with campus university officials?</p> <p>23 A. Uh-huh.</p> <p>24 Q. Yes?</p> <p>25 A. That is correct.</p>	<p>1 Q. So is the Memorial Student Center being</p> <p>2 considered a location for future voting in Waller</p> <p>3 County?</p> <p>4 MR. SEAQUIST: Object to the form.</p> <p>5 THE WITNESS: No, it is not.</p> <p>6 Q. (BY MS. ADEN) And what is your opinion about</p> <p>7 that?</p> <p>8 MR. SEAQUIST: Form.</p> <p>9 THE WITNESS: That it's the -- it takes</p> <p>10 away from the students having access to being able to</p> <p>11 vote.</p> <p>12 Q. (BY MS. ADEN) And do you think it will diminish</p> <p>13 student participation in voting in Waller County?</p> <p>14 MR. SEAQUIST: Object to form.</p> <p>15 THE WITNESS: Drastically.</p> <p>16 Q. (BY MS. ADEN) Not to beat a dead horse, but are</p> <p>17 you aware that the Waller County Community Center is on</p> <p>18 land that used to be part of Prairie View AMU's campus?</p> <p>19 A. That is correct.</p> <p>20 Q. Okay. And does that mean that the Waller</p> <p>21 County Community Center used to be part of the</p> <p>22 plantation?</p> <p>23 MR. SEAQUIST: Object to form.</p> <p>24 THE WITNESS: That is correct.</p> <p>25 MS. ADEN: No other questions.</p>

Jayla Allen, et al. vs. Waller County Texas, et al.
 Jayla Jenice Allen - 10/11/2019

Page 213	Page 215
1 MR. SEAQUIST: We will reserve ours for	1 I, JAYLA JENICE ALLEN, have read the foregoing
2 trial.	2 deposition and hereby affix my signature that same is
3 (Proceedings concluded at 3:01 p.m.)	3 true and correct, except as noted above.
4	4
5	5
6	6 JAYLA JENICE ALLEN
7	7
8	8
9	9 THE STATE OF _____)
10	10 COUNTY OF _____)
11	11
12	12 Before me, _____, on this
13	13 day personally appeared JAYLA JENICE ALLEN, known to me
14	14 (or proved to me under oath or through
15	15 _____) (description of identity
16	16 card or other document)) to be the person whose name is
17	17 subscribed to the foregoing instrument and acknowledged
18	18 to me that they executed the same for the purposes and
19	19 consideration therein expressed.
20	20 Given under my hand and seal of office this
21	21 _____ day of _____, _____.
22	22
23	23
24	24 NOTARY PUBLIC IN AND FOR
25	25 THE STATE OF _____
	COMMISSION EXPIRES: _____
Page 214	Page 216
1 CHANGES AND CORRECTIONS	1 IN THE UNITED STATES DISTRICT COURT
2 WITNESS NAME: DATE OF DEPOSITION:	2 FOR THE SOUTHERN DISTRICT OF TEXAS
3 JAYLA JENICE ALLEN OCTOBER 11, 2019	3 HOUSTON DIVISION
4 PAGE LINE CHANGE REASON	4 JAYLA ALLEN, DAMON)
5	5 JOHNSON, TREASURE SMITH,)
6	5 AND THE PANTHER PARTY,)
7	6 Plaintiffs,)
8	6 VS.) CIVIL ACTION NO.:
9	7) 4:18-CV-3985
10	8 WALLER COUNTY TEXAS; THE)
11	8 WALLER COUNTY)
12	9 COMMISSIONERS COURT;)
13	9 JUDGE CARBETT "TREY" J.)
14	10 DUHON III, IN HIS)
15	10 OFFICIAL CAPACITY AS THE)
16	11 WALLER COUNTY JUDGE; AND)
17	11 CHRISTY A. EASON, IN HER)
18	12 OFFICIAL CAPACITY AS THE)
19	12 WALLER COUNTY ELECTIONS)
20	13 ADMINISTRATOR,)
21	13 Defendants.)
22	14 *****
23	15 REPORTER'S CERTIFICATION
24	16 ORAL DEPOSITION OF JAYLA JENICE ALLEN
25	17 OCTOBER 11, 2019
	18 *****
	19 I, SHERRI SANTMAN FISHER, Certified Shorthand
	20 Reporter in and for the State of Texas, hereby certify
	21 to the following:
	22 That the witness, JAYLA JENICE ALLEN, was duly sworn
	23 by the officer and that the transcript of the oral
	24 deposition is a true record of the testimony given by
	25 the witness;

Jayla Allen, et al. vs. Waller County Texas, et al.
Jayla Jenice Allen - 10/11/2019

Page 217

1 I further certify that pursuant to FRCP Rule
2 30(f)(1) that the signature of the deponent:
3 X was requested by the deponent or a party
4 before the completion of the deposition and returned
5 within 30 days from date of receipt of the transcript.
6 If returned, the attached Changes and Signature Page
7 contains any changes and the reasons therefor;
8 _____ was not requested by the deponent or a party
9 before the completion of the deposition.

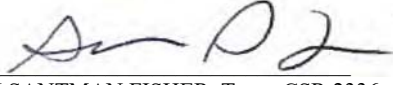
10 That the amount of time used by each party at the
11 deposition is as follows:
12 MS. LEAH ADEN.....0 Hours, 53 Minutes
13 MR. GUNNAR P. SEAQUIST.....3 Hours, 32 Minutes

14 I further certify that I am neither counsel for,
15 related to, nor employed by any of the parties or
16 attorneys in the action in which this proceeding was
17 taken, and further that I am not financially or
18 otherwise interested in the outcome of the action.

19 Certified to by me this 20th of October, 2019.

20

21

22 
23 SHERRI SANTMAN FISHER, Texas CSR 2336
24 CSR Expiration Date: 12/31/19
25 COOLEY REPORTING, Firm No. 702
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Austin, Texas 78750
512-743-5867/512-410-3012